



LUKE FOX

OBJECT

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*As a resident of Moss Vale, in a house over 100 years old, where I work, educate, and raise my children, where we grow food, create, and sell art, and where we share our vision for a sustainable world, I object to the PlasRefine project.*

*Australia has an unfortunate habit of paving the way to hellish outcomes by means of well-intentioned but ultimately ill-fated solutions.*

*In 1935, 2400 cane toads were released near Cairns, Queensland, with the intention of addressing the issue of beetles damaging sugar cane crops. Australia™s unique ecosystem made this a bad idea. With no natural enemies and indiscriminate feeding habits, the cane toad has devastated native wildlife populations in four states. They did not reduce beetle numbers.*

*More recently, Australia allowed nicotine vapes to be widely available. The idea that the use of nicotine vapes would offer a less harmful alternative to nicotine-addicted cigarette smokers and help them to quit was, again, well-intentioned. The result, however, has seen huge numbers of children and young people addicted to high levels of nicotine. A study published in the National Academies Press (1) found Australian teenagers aged 12–17 years who vape are five times more likely to start smoking in the future. For 12-year-olds alone, it™s 29 times more likely they will try cigarettes.*

*The plastics industry globally is a \$712 billion behemoth and is intrinsically linked to the \$6.25 trillion fossil fuel industry. Both have significant political power to lobby to keep restrictions low and to ensure recycling is presented as a viable solution to the problem of plastic waste. It remains, irrationally, a championed æplanet-friendly¿ initiative. This despite only 9% of plastics being recycled, and the recycling process itself only delaying the plastic™s arrival at landfill. In the process, the plastic is often reduced in quality and increased in brittleness. Garden furniture, for instance, sits outside, is sun-damaged, and turns inevitably into microplastic, released to the wind. Recycling, it™s arguable, is really just æpre-digestion¿ on the path to microplastic. If the plastic were simply buried, it would leach into the environment but not be transformed into particles that end up in the brains of babies.*

*The problems of plastics in our ecosystem, and microplastics in our bodies as a result, enjoy wide public awareness. The risks, however, are not fully understood. The problem has developed so far and so fast that legislation has yet to address the issue. PlasRefine knows this. In his submission to the IPC, GHD Technical Director for Environment and Contaminants makes a point of stating, æ¡there are no limits currently for microplastics or PFAS!¿ PlasRefine could reasonably expect compensation from the Government if new legislation were to affect the operation financially. The risk to PlasRefine is low. Their piecemeal approach to addressing each perceived issue as it is identified, often by local residents rather than a comprehensive environmental study by either the proponent or the IPC, has allowed PlasRefine to maintain the impression of concern without the need to address actual scientifically supported standards or professionally prepared environmental issues. They need only to present the impression of addressing a perceived issue and maintain that impression on the basis of the faultless application of their proposed solutions. If their solutions fail, we will find out only after the dangers have been identified and the damage to residents, children in particular, and Moss Vale have already occurred. Essentially, it will be too late. No amount of hand-wringing or compensation will change this.*



*The placement of Australia™s largest plastics plant so close to daycare centers and residents could only ever be entertained in a regulatory environment that is lagging behind the emerging, and alarming, science around plastic. Some 16,000 chemicals are used in plastic. Only 6% are subject to regulation. Chemicals in plastic include endocrine disrupters, attacking our hormones and bodily functions, causing cancers, infertility, heart disease, and more. Recycling, presented and promoted by a multi-trillion-dollar industry, has been shown to magnify exposure to these dangerous chemicals (5, 6, 7).*

*As I write this submission, the UN is in the final round of negotiations for a Global Plastics Treaty (8). The treaty does not regard recycling as a solution. The treaty website points out that only the petrochemical industry does. The site says that recycling concentrates chemicals in a product that only delays the plastic going to waste. It likens plastic to leaded fuel. The chemicals must be removed to make re-using them safe. It is worth noting it took a decade for vested interests in the fuel industry to cease resisting the addition of lead, despite it contributing to decreases in intelligence in children and increases in violence in urban environments. Just like microplastics, the lengthy process began with the accidental discovery of lead wherever (including Antarctica) scientists looked for it. We are at the beginning of a similar scenario for plastic, and unless the IPC rejects the proposal of such a facility so close to children, no one who plays a role in such an approval can later claim to have done so unknowingly.*

*In 2019, the IPC rejected the Bylong Valley Coal Mine. The commission cited climate change as a basis to do so. It identified a need to consider the long-term environmental impact of such a mine. The IPC, in my view, was right to do so. It now needs to employ the same sound judgment and foresight to see that plastics present a real and present danger to humans and to anticipate those dangers beyond what is not represented in current legislation (which is bound to emerge) and in anticipation of the very real dangers to children. The IPC is tasked to deliver a high level of independence, expertise, and transparency to the assessment and determination of State Significant Development applications in NSW.*

*If the commission chooses to approve the PlasRefine project, I am putting it on notice that I will demand a fully transparent justification for the decision to place the enrichment of a foreign-owned company, the political objectives of the NSW Government, and the adherence to inadequate legislation (despite its previous Byong decision) over the health of children living in Moss Vale and The Southern Highlands and Sydney (through water supply) more generally.*

*Like the cane toad and the vape pen before it, plastic recycling per se, and most especially near to children living and attending educational facilities nearby, is a possibly well-intentioned, ægreen activity that will inevitably turn out to be a terrible mistake. The history books, however, will record that, unlike the toads and vapes, people saw this coming, organized, and desperately pleaded for it not to occur, and were ignored by those in the position to act.*

*While there are a number of other reasons to reject this proposal, such as the woeful fire response plan which relies on two small fire appliances and a volunteer crew, or the 100 truck movements daily, there is one more factor I wish to mention.*

*Regardless of whether the IPC chooses to ignore the emerging science, the United Nations, and the residents of Moss Vale, the perception that the plant presents a danger to residents is very real and cannot be denied. Perception alone is enough to turn away businesses, and this has already happened. Perception alone is enough to see people move away, many have stated they will. Perception alone is enough to damage the reputation of Moss Vale. GHB failed in their community consultation phase to dampen said perception. I attended one myself and found it to be poor in scope and detail. I was also shocked to see them disrespect an elected member of parliament, also in attendance, one Wendy Tuckerman. I did not vote for her but she is elected by the people of the area and should be regarded as a representative of the populace. It was telling that GHB staff saw her as a nuisance and spoke to her like someone of no consequence. It is telling, and they act as though we, the people of Moss Vale, are merely a speed bump to be patronized and ultimately disregarded as they push through yet another project that they care only about because of their consult fee.*



*Importantly, they have convinced no one their plant is safe. Does the IPC 100% warrant that it is? If not, then please consider carefully the proponents™ promises of 100% effective operation of mitigation, of its back-of-the-envelope fire plan, and of its failure to assure the residents or those who seek to set up in Moss Vale that, unlike the UN and hundreds of scientists who would disagree, that there is nothing to worry about.*

*Thank you,*

*Luke Fox*

*November 25, 2024*

#### *References*

*\* National Academies of Sciences, Engineering, and Medicine. 2018. Public Health Consequences of E-Cigarettes. Washington, DC: The National Academies Press. doi: 10.17226/24952.*

*\* The Guardian. 2024. World unable to cope in 10 years: talks on UN global treaty to end plastic waste. <https://amp.theguardian.com/environment/2024/nov/24/world-unable-cope-10-years-talks-un-global-treaty-to-end-plastic-waste>*

*\* ScienceDirect. 2024. The impact of plastic pollution on human health: A review. <https://www.sciencedirect.com/science/article/pii/S1326020024000487?via%3Dihub>*

*\* Global Plastics Treaty. FAQs. <https://www.globalplasticstreaty>.*

*\* <https://www.parliament.nsw.gov.au/tp/files/75100/Independent%20Planning%20Commission%202018.pdf>*

*\* <http://www.clarksvilleonline.com/2019/01/06/tennessee-department-of-health-issues-public-health-advisory-on-nicotine-chemicals-delivery-systems/>*

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