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OBJECT

Submission ID: 218388

Organisation: N/A	Key issues: <i>Social impacts, Land use compatibility (surrounding land uses)</i>
Location: <i>New South Wales 2576</i>	
Attachment: N/A	

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I am writing to strongly OBJECT to the proposed Plasrefine proposal for Moss Vale™s township.

Four years into the opposition of this proposal, the proponent has not once addressed the primary concern of the community"site suitability and site selection. Specifically, why a landlocked site next to residential homes ever made sense for their proposed high-risk, heavy-industry plastics processing proposal.

I grew up in the Southern Highlands and my husband and I are now raising our children and running a business here. We moved from Sydney to give our kids the green space, fresh air and sense of community that is unique to the Southern Highlands. My parents are sensitive receivers™ (i.e. neighbouring residents) to this proposal. To say Plasrefine has cast a shadow of worry and anxiety over our extended family for the past 4 years would be an understatement.

The Christmas Eve drop of a blank envelope notifying them of this proposal was so distressing that they chose not to reveal it to their adult children and partners (and grandkids) on Christmas Day. They did not want to ruin a rare and special day together for us all. Instead, they were isolated in their worry and shock, with no one to call for clarification and nowhere to find further details or information until the new year. Cynically, I believe this sense of isolation and futility was intended and set the tone for what was to come in engaging with GHD and the proponent. A lack of clarity, confusingly vague and highly controlled ~engagement opportunities™ that produced tightly curated ~community feedback™ that was later reframed in GHD™s documentation for the proponent™s fulfilment of planning requirements. Waffling and evasive responses to thoughtful and sometimes basic community concerns gave the impression that any ~engagement™ was a box-ticking exercise for the proponent and their representative, GHD.

But perhaps, most distressing of all, has been the overwhelming sense from GHD that the community has been ~unreasonable™ or ~difficult™ for not just getting on board with the proposal. A proposal that has only become more confusing and worrying as multiple versions of haulage routes, vague and misleading building imagery, and poorly conceived landscaping plans have been provided. It has felt like the entire project has been being haphazardly planned ~on the go™ just to get it over the line of approval. Bandaid measure after Bandaid measure. There has been an undue and concerning burden placed on members of the community to raise critical issues and inconsistencies throughout the documentation. Any amendments made in response have then been presented as the proponent being ~responsive™ to community feedback. Instead, it raises questions as to the quality of the proposal and suspicion as to the integrity of the tweaks being made (even in response to this IPC process - the ever-changing roller doors for one) and whether they will be applied if this were to go ahead.

Similarly, the burden to share information about the proposal has also rested with the community. Many residents have only found out about Plasrefine in recent weeks. I find it so confusing to have found out about the supposed 4000 household letter-drop by GHD in their recent slideshow for the IPC. Is there a record of this contract with a map of these letter-dropped households? This does not seem possible with the number of locals who have been shocked to hear about the nature, location and current stage of the proposal, even recently.

Community members have dedicated hours of their time, applying their relevant expertise or becoming well-versed in all manner of things relating to plastics recycling, planning procedures, riparian land, microplastics, fire risk and procedures, etc. This time has been taken from all aspects of our lives"work, retirement, leisure,



and family. It remains that at no time in the last four years has there been a visible or vocal local supporter of the proposal. Not one. There is no silent majority™ (GHD IPC transcript). Our community is united in opposition. This time has not been dedicated as a reflexive ~NIMBY™ response. It has been born of a genuine and practical fear of what this proposal would do to our local environment, the health and well-being of residents and the future economic viability of the region. But in raising the NIMBY factor. This kind of industry does not belong in anyone™s backyard. It belongs away from homes and schools, near appropriate transport routes (rail) and in a location that does not risk leaching chemicals into fertile farmland, microplastics and forever chemicals entering a major water catchment and conducting high fire risk factory processes on classified bushfire-prone land.

Far from what was expressed by GHD about this project, that social media [has been] toxic, the community has been given a much-needed point of connection via social media. The aforementioned isolation and futility of the announcement of this proposal have been countered by the coming together of the Moss Vale Matters Facebook community and beyond. Bonded by the common goal of preserving the health and well-being of our community and protecting the health and well-being of future generations. The engaged, respectful, and dedicated members of this group have shared academic research, given technical support to navigate submission portals and provided encouragement in the face of frustration and disappointment. To provide motivation to keep fighting even when every democratically elected representative for our community, at every level of government, agrees that this is not the right site for the proposal, and yet we are still fighting, four years later.

The initial confidence that justice and commonsense would prevail through a rigorous evaluation process has been destroyed. The Premier told our community to ~trust the process™ (radio callback). Within days, I had heard that ~word out of the department is that they want this to go through, and then old buses were delivered to the site by the proponent to use as a makeshift office, all just days before the department approval was announced. I would have once thought that it was a little too conspiratorial to consider things like ~follow the money or ~where are the lobbyists, or ~what grants have been promised, but I must admit, this thought occurs to me often in light of the way this has all been handled. Listening to the Department defend the many holes and vagaries in the application and asserting that the high levels of risk and the irreparable impact on the future of Moss Vale can be managed via post-approval conditions, my confidence in ~the process™ is at an all-time low.

I understand that we are not able to assess the proponent™s industry background or financial motivations. (I actually do not understand this as it seems critical to the interrogation of the technical processes that will be used by the company, the likelihood of compliance and respect for the local environment given past censures, but for the purpose of this submission, I will stick to what the IPC is able to evaluate). What I do hope can be considered is that the likely lifespan of this project will be relatively short-term. The down-cycling of plastic for one more use before ending up in landfill is already considered to be an outdated process. Once the proponent has made their profit, the lack of genuine connection to the community would suggest that they will move on to the next thing. Leaving a toxic site behind and having already destroyed any possibility for the Southern Highlands Innovation Precinct and the potential it held for future generations.

There is no social license for this proposal. There is no trust in the proponent. There is already a multi-generational negative mental health impact on the community and this has been only exacerbated by how engagement has been handled by the proponent and GHD. The Department™s assessment of the social impact of this proposal by Professor Ryan was superficial and showed a lack of understanding of the depth of concern and genuine anxiety in the local community. It also heavily relied on the problematically skewed community data that was carefully selected by GHD and then by the GHD-contracted EthosUrban (which was only done on instruction, never volunteered). Further, the suggestion of future mitigation of social issues being addressed via community groups is offensive. This transfer of the burden of compliance and conditions on our local council and our community for the financial profit of a private corporation and the target reaching of our State Government is a common theme.



We have a plastic problem in Australia and we are a community that is particularly sensitive to this and willing to help fight this problem. People move to the Highlands for the connection with their environment. This also means you have a community that is aware of the danger of plastic pollution and the imminent risk that breaking down plastic has on air and water quality and health. It is almost a daily occurrence that a reputable news article or journal paper is released regarding the mounting environmental and health risks of microplastics and forever chemicals. There is a current Senate Inquiry into forever chemicals that is revealing we are lagging in our governance. We know there is risk to health and well-being when these chemicals and plastic particles enter our bodies. This is known. What we are still working out is the extent to which it is dangerous - not if. The evidence is mounting that our current regulations are not up to date and that we are, in fact, behind Europe and other international jurisdictions in ensuring our requirements of proposals like Plasrefine are up to date and based on the latest research. Our community is asked to be reassured by an employee of GHD (Dr Bowman) providing "expert opinion" that the risk is "acceptable" despite having previously been quoted in a podcast advising of a risk-averse approach on forever chemicals.

æ; it often doesn't matter what the chemical is. We don't want it in our drinking water. We don't want them in our food. We want to have safe, breathable air. We want to have safe drinking water and it is best to ensure that we are not releasing chemical into areas that we are using for food and water.

(Ep 40 Talking PFAS Dr Mark Bowman GHD - At Clean-up Conference 2022, SA).

Plasrefine is proposed to be built on riparian land, where rain events cause water to flow across the site, where the frequent morning mist sits low, and then settles across the paddocks and flows into Sydney's drinking water. On rich farmland and next to vineyards. Spewing emissions into the air only metres from a childrens' daycare. No mitigation is absolute. No level of risk is acceptable when so close to residents. It doesn't make sense.

It is difficult to assess the specifics of a proposal when it is so dangerously unsuitable in any iteration for the site proposed. However, to provide constructive feedback within the scope of the IPC process:

** Insufficient buffer between residents and the facility. The scale of this project and the nature of the processes to be undertaken (chemicals, melting plastic, 24/7 operation) do not belong on the doorstep of residential homes. There is no haulage route or landscaping that can mitigate this. It is too big, too high-risk and too close to residents. There is no appropriate buffer possible at this site between industry and community.*

** Fire risk. There is an unacceptable risk of fire. The Southern Highlands has experienced terrible bushfire seasons and we have lost people and property to fire. The community is well aware of the risk and danger of fire and to place this burden on our local fire stations and firefighters is a tragedy waiting to happen. We have a single Hazmat truck and the proposed reinforcements and equipment coming from (at best) 50 minutes away is unacceptable and life-threatening. In a recent fire at a similar facility in Kempsey (4 Nov), located further away from homes than is proposed for Plasrefine, the incident SMS alert to residents was sent at 11:47 pm. Nearby residents noted in the "NSW Incidents Alerts" comments on Facebook that they went to sleep with windows open and woke up feeling unwell, asthmatic and to the smell of burning plastic. It was also noted in the alert that æsmoke [was] expected to settle over a wide area [tonight]. (NSW Incident Alerts 4 Nov Facebook post: "Close all windows and doors").*

** Roads and Traffic. Our roads are already in desperate need of repair and at significant cost. Our roads are congested as the population has expanded with infrastructure still catching up. This proposal will exceed the capacity of our roads and leave the local community footing the bill for their deterioration. Whilst also greatly increasing the risk to pedestrians and polluting residential streets with fumes and excessive noise. Compliance regarding designated road routes (when a faster option may be available due to the frequent congestion of our main arteries) is also an undue burden on our local authorities and will be difficult to monitor.*

** Environmental pollution. This is inevitable. The environment will be impacted by the chemicals and emissions of this proposal. There is no mitigation that will eliminate this risk. To place this development in a particularly*



vulnerable location - riparian land, next to residents, on fertile soil used for farming and commercial growing, is unacceptable. Forever chemicals and micro plastics can not be retroactively "cleaned-up". We need to prevent preventable contamination from the outset.

** Commercial impact. Many businesses in the local area are tourist-focused and based on the reputation of the Southern Highlands as a retreat from the city. The income of many locals is due to tourists being drawn to our environment and the regions natural beauty and character. Economic growth has been consistent as the Highlands is a destination for tree-changers. The proposed Southern Highlands Innovation Precinct (which has already received state funding) would offer long-term career prospects for our children. A plastics refinery in the town centre is a planning abomination for local businesses as it would harm the character, reputation and perception of the entire region. It would also deter tourists and future businesses from investing in the local economy.*

** Health and wellbeing. Microplastics and forever chemicals are a known risk to the health and well-being of people and communities. To prioritise a short-term fix for the plastics problem by leeching toxic materials and fumes into soil, water and air, only metres away from residents, would be to accept the likelihood of increased illness, infertility, shortened life expectancy, respiratory distress and death. This is not a personal opinion. This is what we know. So far. My concern is that this will be the lead, nicotine, asbestos or silicosis for ours and generations to come. This industry does not belong next door to families.*

** Future generations. I brought my children to the beginning of the first IPC meeting to show them how hard the community is fighting and how energised and unified the people fighting it are. Community members volunteering precious time to speak up for future generations. We have a duty of care to younger generations to be risk-averse when it comes to irreparably poisoning our waterways and environment and exacerbating climate change - particularly when we are on the cusp of true innovation in plastic processing (enzyme not melting, true circular recycling not downcycling to landfill, reducing plastic use altogether). The risk to future generations is increasingly a focus of human rights law, as it should be. The Rights of Children should be considered when approving a proposal that will inevitably cause negative consequences well into the future.*

In an article today - submission day (25 November), Andrew Forrest writes in the Sydney Morning Herald ("We have a once-in-a-generation chance to halt the march of plastic"):

It is now a scientific fact that plastic chemicals are making us fatter, sicker and less fertile.

If the world does nothing, if the negotiators just tinker around the edges, we are locking ourselves into a future where we and our kids get more and more unwell from the plastic chemicals building up in our food, our water and our bodies.

Unsurprisingly, some fossil fuel companies and countries are actively lobbying for a weak treaty - because they're profiting from plastics.

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These lobbyists and counties with a vested interest will tell you recycling is the solution. That the onus is on you, the consumer, to recycle more. What they conveniently neglect to mention is that recycled plastic can be more hazardous than virgin plastic.

In closing, please consider the ramifications of this proposal going through for our community. We cannot be left to bear the consequences of this now or in the future.

I am aware of multiple families making plans to leave the area should this be approved. This is not a knee-jerk panic or ill-informed overreaction on their part. This is a thoughtful and painful decision, arrived at because they do not want to risk their family's health and well-being. They don't want to eat the food from their home veggie garden or eggs from their chickens or send their kids to play in the playgrounds of schools nearby; only to find out years later that their adult child's infertility or early onset cancer was linked to environmental



factors (Lifestyle and the "lag effect": What's causing the rise of early onset cancer, Sarah Berry, The Sydney Morning Herald, Nov 22 2024).

On a personal note, nothing will take away the (now) years of worry, stress and genuine fear that my family has endured. The hours spent writing up questions that have still not been addressed, studying plans and pointing out issues that remain unresolved, trying to understand proposed access routes that never made sense or feeling completely abandoned by decision-makers who are supposed to deliver thriving communities, public spaces, places and economies. (Department of Planning, Housing and Infrastructure landing page at nsw.gov.au) through thorough assessment and rigorous interrogation of plans and processes and good planning for people, not industry. To be left with department-level approval for a proposal that has, since day one, made no sense in its location is distressing. To be told to fight it through the process provided, only to find that dates and expectations are consistently changed for the proponent but that there is no such grace or flexibility for the community, and that approval can be granted with so much still unaddressed or unknown is beyond comprehension. So I will focus on this irrefutable fact. This site is not appropriate for this proposal, there is no reason that the land selected by the investor and business should be considered as particularly suitable for this kind of industry. Demonstrably the opposite can and has been well addressed by the community. Including but not limited to:

- * Risk to water catchment due to riparian land/water course.*
- * Lack of appropriate road access.*
- * Proximity to residents.*
- * Proximity to a leading research facility with fragile specimens (Garvan).*
- * Negative impact on the future land use of adjoining properties.*
- * Negative impact on the character and amenity of Moss Vale.*
- * Removal of endangered trees (Eucalyptus Macarthurii).*
- * Risk to endangered animal populations (Platypus).*
- * Nature of industry (hazardous, heavy industry).*
- * High fire danger and risk to residents.*
- * Emerging documented risk to the health and well-being of the community.*

Hazardous industry belongs in a purposefully designed and risk-mitigated precinct, away from residents. It is not the right site.

Thank you for your time and attention.
