(47)

John Swainston - [redacted]
[redacted] Bowral, NSW 2576 - Monday afternoon

I have lived in Bowral for almost 9 years. I was a company director in the photographic industry for 40 years, now a writer and photographer and a grandparent of a [redacted] at a [redacted] 600 metres from this site. I sat on Australia's first battery recycling committee in 2005-6, working with the CSIRO to establish a viable capture, recycling and value creation business model to prevent toxic but valuable metals (Nickel Metal Hydride and Lithium) from going to landfill.[1] The initiative failed then because the captured value was not adequate to find a market. For Plastics that value capture equation is substantially doubtful based on recent market pricing of virgin materials.

In theory, plastic recycling is a means to create valuable output from society's waste. But the process is not infinite. Quality degradation occurs every time you recycle. Ultimately plastic recycling only delays the placement of used plastics in landfill. The real solution is to reduce plastic use at the front end, not recycling it. This proposal is poor in its economic viability for the investors, poor in real-world risk management. The recommended development consent fails to address the realities of the location chosen, for four critical issues.

Firstly - Fire Risk:
At present, Moss Vale has just one actively manned Fire Engine and one reserve fire engine. It then has backup support from the Rural Fire Service with several more appliances. Advanced appliances are about an hour away. None of these teams is specifically trained in the detailed complexities of a large chemical fire. The response time is unlikely to be possible in under ten minutes for the first appliance. In the event of a heat-generated plastic fire within the plant, none of these devices would be adequate to extinguish a fire that escaped the factory envelope. They just can't set up close enough to what would be up to an 1100 degree fire. None of the 5 Highlands appliances are equipped to handle a 17.5M structure including the stacks. There are just two roads for entry and exit, one a residential street, the other over an unmanned rail crossing. The entire site and potentially adjacent properties, would very likely be completely lost. This real world risk is not addressed.

Second, Microplastics emissions:
With a projected 50 truck movements a day, twice, delivering and picking up, the projected 120,000 tonnes of material, allowing for a 10-minute cycle to discharge or collect materials, this would require the loading dock doors to be open for up to 8 hours a day. Based on other plastic recycling plants, up to 40% of materials will not be suitable for recycling and will leave unprocessed from the plant and go to landfill. But that will have to be re-compacted prior to transport out. With south-westerly winds blowing at recorded speeds in excess of 100kms an hour on multiple occasions each winter, it is inevitable air-born microplastics will escape the plant. A much more comprehensive double-door loading dock designed with a negative pressure envelope to contain microplastics, is surely mandatory. But there is no space on the property in the recommended design for this requirement to be added.

The third issue is Water use and discharged microplastics
Best practice in manufacture is to reuse and internally re-use process water. In the

[1] *Proceedings of Green Processing 2006*, Newcastle Australia, The Australian Institute of Mining & Mettallurgy p55 - 59. (Photocopy Text available from the author.)

recommended design it appears that the plant will require predominantly fresh water volume. Moss Vale's Water treatment plant is old, is already under pressure. Removing the statically charged microplastic elements from discharged water is complex and is never fullproof. The ingress of microplastics to soils and air quality reduction for the whole Highlands Community will be very significant. This is inadequately addressed in the recommended Development.

Finally, all production plants have a useful life.
Plastic recycling is a variety of chemical extraction, heat and other conversion techniques. Even Europe is only now waking up to the long-term impact of residual plastics in animals, children, unborn children with the first legislation being discussed this very week in Brussels.. Nowhere can I see the process for, and assurance of land remediation at the plant's end of life. Who will pay? Where is the assurance the company has either the experience for land remediation or the financial ability at end of life. In this location, Plasrefine could potentially be a long-term financial and environmental impact on the community that would be unaffordable to the company or the community.

in my experience, this is an economically marginal development; It also contains multiple inadequately addressed risks.

It is as yet not the right project, and it's decidedly not the right site.