The 3 areas of concern that I wish to address this evening, are: FIRE, EMISSIONS and LIGHTING.

On Christmas Eve 2020, several Moss Vale residents received devastating news via a letterbox drop. Tucked inside a plain white envelope was notification of a proposal that would ultimately change their lives to establish an enormous plastics recycling factory, literally on their doorstep. These "sensitive receivers," as they have been constantly referred to in GHD documents, were not only shocked but also devastated. With no immediate recourse over the Christmas break, due to holiday closures, those residents were left beyond desperate for clarification and information not immediately available. So began our 4-year David and Goliath battle against the establishment of a totally inappropriate facility on a site, which despite its zoning, has for years retained an essentially a rural residential aspect. The proposed site is less than 200 metres from homes, only 90 metres from an approved new home subdivision, with many of the closest residents having lived their entire lives in that area. It is considerably closer to businesses without any effective buffer zone, apart from proposed mounds and trees and is proposing to operate 24/7. Within a mere 62 metres proximity, is the Australian Bio Resource (ABR) Garvan Institute, an internationally recognised medical facility, researching cures for a vast variety of diseases and conditions. To place such an important lifesaving institution at risk is beyond reprehensible. Plasrefine has become the Christmas 'present' that keeps on giving.

The fact that IN1 General Industrial zoning (now E4) exists for that specific area and therefore allows such a proposal to be considered, does in no way make it appropriate for the area, particularly in light of Council's draft design for the SHIP – Southern Highlands Innovation Park. This is a community supported and State Government funded initiative to establish facilities within the SHIP which will promote and foster such enterprises as education, technology, innovation, employment opportunities, etc. It should not be placed at extreme risk of failure, to accommodate an unwanted plastics recycling industry that should, by rights be reclassified as Heavy Industry or even Hazardous, due to the chemicals used in cleaning and processing, the resultant emissions produced, the inevitability of a fire, the effects on the surrounding environment, homes and businesses, the health impacts and the destruction of our community's way of life. Why should the community's multitude of concerns and extreme opposition, be set aside in the headlong rush to achieve State Government recycling targets? Where is the duty of care to its citizens?

Of paramount importance in the establishment of any industrial proposal, should be the health, safety and welfare of the community and yet, there has been no health study conducted which should have been a mandatory requirement. The location of such a factory without a suitable buffer zone, particularly in light of the draft design for the SHIP, simply beggars belief.

The bulk and scale of Plasrefine is enormous. Its factories total 8 acres in size, far exceeding the building to land ratio considered essential for any development approval. The land size to accommodate such a huge complex is simply too small and in terms of a fire, the access and available resources are severely restricted, therefore placing surrounding homes and businesses in peril. Our local fire stations are not manned 24/7 and our members are on call.

Our fire brigades are ill-equipped to deal with such a chemical catastrophe, which would undoubtedly also require aerial support. Plasrefine has stated that our local fire crews at Moss Vale, Bowral and Mittagong, would initially respond with 3 Class 2 pumper trucks and 1 Class 1 hazmat tanker. IF additional support is required, it would need to come from Campbelltown and Wollongong, a distance of some 45 minutes away. Meanwhile Plasrefine burns, sending highly toxic, carcinogenic emissions towards our northern neighbours on the prevailing westerly winds, so common in the Highlands.

Plasrefine's total disregard of the community for which they profess to want as a "good neighbour" is clearly on display. Having been quizzed by the DPHI regarding their onsite fire management infrastructure, Plasrefine has stated that they will be prepared with "emergency fire tanks (up to 1,200kL storage volume), internal and external hydrants, a fire hose reel system, a hydrant and sprinkler booster assembly, a pumping station and a firewater containment system." This all sounds highly satisfactory and professional, that is, until we drill down into the details….their fire tank may have sufficient capacity in storage volume, but our area is often prone to drought, so if there is no rain for long periods at a time, where does this water come from? The answer is….Wingecarribee's own potable water supply. Secondly, since the facility proposes to operate on a 24/7 basis, there are no details as to who is sufficiently qualified to operate this equipment. No mention of an experienced onsite firefighting team. Instead, they are relying on local and external sources to deal with the issue, which is highly unsatisfactory and unacceptable. There does not appear to be a plan in place for this eventuality and a hazardous chemical fire in a facility of this size will be enormous, ferocious and fast acting. What warning system is in place to notify residents and businesses of this eventuality? Building 1, the main processing building, is 22,848m2 or approximately 6 acres, whilst Building 2 is 8,496m2 or approximately 2 acres, which would make evacuation procedures extremely difficult.

In earlier documents, GHD stated that a Plasrefine representative would door-knock residents to advise of an incident, which is beyond ridiculous. Even if such an "initiative" was possible in the time available, most of the "sensitive receivers" live on rural acreages, not small residential blocks easily accessed for notification purposes and in the event of a catastrophic fire, time is critical. Given the massive height and proximity of the buildings to one another, it is fair to assume that they would be extremely difficult to extinguish in such an event, without considerable aerial support, which is not immediately available. Again, a time critical factor. From the visuals provided, there exists a corridor between the two factories, which in theory, would allow for fire truck and tanker access, although the height would surely preclude this, being far too dangerous in terms of the high probability of building collapse, falling debris and potential worker injuries or worse.

A fire at a plastics recycling facility burns with extreme ferocity, fuelled by the highly flammable materials being both stored as bulk waste (in this instance, 2 bins totalling 9,600 tonnes) and also being used during processing.

On a global scale, since 2019, there have been over 70 fires in plastics recycling, sorting and reprocessing facilities, resulting in loss of life, injured workers and fire fighters requiring hospitalisation, highly toxic carcinogenic emissions, contaminated waterways and

environment, a rise in serious health conditions and in several cases, mass evacuations for indefinite time periods. Australia has not been immune from these dangers, with more than 18 such fires since 2019. These fires are unfortunately, a regular occurrence due to the nature and flammability of the industry and in consideration of the Plasrefine proposal, it's not a matter of 'IF' but 'WHEN' particularly since it is located in a bushfire prone area.

The close proximity of the site, to category one and two riparian zones, both within the drinking water catchments of Sydney and the Wingecarribee Shire, places additional significance on a factory fire event. There is an extreme and unacceptable risk of contamination from airborne toxins, falling debris, micro and nano plastics and additionally, firefighting foam. The fire aspect is only one of countless reasons why our community is so determined to protest against the acceptance of this proposal on this highly unsuitable site.

My second concern, revolves around the 4 emissions stacks and 33 rooftop 'vents.' It took considerable scanning of several GHD documents to ascertain exactly where these stacks were located, at what height and more significantly, precisely how many were intended. This information was not readily available in one easily accessible location. It is of considerable concern and relevance, not only to the wider community and northern towns and villages, but also to the most immediate "sensitive receivers" and businesses, the Garvan Institute in particular and also the EPA. Perhaps this could be considered a strategic move by the proponent. Obtaining this information required trawling through several documents and pouring over designs, updates, figures and tables, to unscramble the information and finally establish the statistics required. The main processing building, also referenced as Building 1, at a height of 15.5m has 2 rooftop stacks on the Northern Elevation, of no specified height and what appears to be 9 rooftop 'vents,' again, of no specified height in any design documents. Mention is made of each of the 4 stacks being attached to an air pollution control system in Appendix J of the RTS. It states that "each process area would have a series of air collection hoods and that all captured air would be piped to the 4 air pollution control systems for treatment, prior to being emitted from a stack above the roof."

However, there does not seem to be any indication anywhere, of a filtering system for the vents, meaning any additional noise, emissions and odour will disseminate into the environment. An Admin/Multi Use building at a height of 15.5m which adjoins the remainder of Building 2 (14.5m) with an additional 2 stacks and what appears to be 24 rooftop 'vents.' There has been no mention anywhere in preliminary documents of rooftop 'vents' or 'plants,' only skylights and solar panels. Preliminary documents did, however, show a diagram of a single stack, greater than 22 metres high. If this is still the anticipated height, then obviously being a rooftop stack on a building of 15.5 metres, the stack would need to rise a further 6.5 metres, to achieve that height, not 2 metres, as mentioned by GHD.

Of extreme concern is bullet point 3. contained in the EPA document entitled, "EPA Advice on Amendment Report." Point 3. of the document states, "The plant must be designed to not preclude the retrofit or inclusion of additional air emission controls and/or increases in

stack heights from air emission sources." So, the final design or amendment as needed, could mean an enormous, unspecified increase in the height of those stacks.

Additionally, a document entitled "Updated Architectural Plans" states "Design decisions such as the placement of windows, skylights and solar panels, have been based upon a site analysis and building orientation to provide the best views, light and ventilation into the building." Anything permitting ventilation creates the potential for emissions issues. Earlier documentation recommended that residents could limit their time outdoors to combat any possible emissions released thereby defeating the whole purpose of living in the Highlands and that the employees of the Garvan Institute would not be affected as their facility is air conditioned, despite the fact that they frequently enjoy sitting outside for lunch.

All Highlands residents are fully aware of the unique weather conditions experienced each year. The designated site and the township of Moss Vale itself, are prone to prevailing westerlies, which can frequently reach speeds of between 60 – 100 knots. This is not an uncommon occurrence. Also to be considered, are the heavy fog conditions to which this area is prone, particularly during the winter months. The fog on these undulating rolling hills, quite often does not lift until lunchtime. The relevance of these weather conditions relates directly to the transfer of all and any emissions, noise and odours produced which will either be dissipated into the local environment and settle over surrounding areas and waterways, or in other instances, far more likely to be blown towards the townships of Burradoo, Bowral and surrounding areas, impacting not only those local residents, but also the schools and businesses. The facility makes no mention of having an Offensive Industry Licence, merely a requirement to conduct an annual air quality audit!

My final area of concern is the lighting of this facility. There are a total of 180 external lights on the building perimeters and along the driveways and parking lots. 105 of these are wall lights @ 11 watts, described as floodlights, at an approximate height of 6 metres, whilst the remaining 75 are pole top luminaire lights @ 90 watts with unspecified heights. The Amendment RTS Updated Architectural Plan states: "A light spill analysis has also been conducted to ensure the surrounding areas will not be impacted by the lights within the site." Interestingly enough, the assessment clearly shows a pass being achieved in all aspects. However, that would not be difficult to accomplish, given that the assessment was conducted at 10.35.15 AM. There is no mention of internal lighting, particularly with regard to the Administration Building which will face east, towards the Garvan Institute at a height of 16.7 metres. The adult mice and more particularly the embryos, within that facility, are particularly susceptible to light and noise. GHD has claimed that an analysis from their light spill assessment "showed that the lighting design complies with the relevant standards and regulations and does not cause any significant disturbance or nuisance to the neighbouring properties...while also creating a pleasant and inviting atmosphere." I'm sure there are many nearby residents who would dispute that statement and would love to continue enjoying the pleasant and inviting atmosphere that already exists, specifically the "rolling green hills" mentioned by GHD and the "large windows, which create a sense of openness and spaciousness, while also allowing the occupants to enjoy the views and the natural elements." These are the same views and natural elements that have been enjoyed for decades by the residents and business owners, who are now to be denied of those same pleasures.

The montages supplied to indicate the nighttime light spill effects from various angles and distances and proposed mitigation measures, have also been created at questionable timeslots. Some were photographed at 7.50pm on November 24th and again at 8.20pm. Unsurprisingly, as it isn't properly dark at those times, due to Daylight Saving, there was minimal light spill evident. The lack of suitable darkness for an accurate light spill indication, is clearly evident in the photographs' sky images. A genuine nighttime light spill assessment would have been far more accurate, had the photographs been taken at least one hour later. None of the montages presented showed accurate darkness, and all buildings were heavily screened by mature trees several metres high. The mature tree plantings used by a nearby factory, were not included in the montage however, only those belonging to Plasrefine.

In conclusion, I am hopeful that the community's concerns and multitude of objections to Plasrefine on a site which is not suited to this type of heavy industry and all it entails, will be sufficient to reject this proposal. There are areas that have been specifically set aside within the draft design for our Southern Highlands Innovation Park supported by the community. It has been designed by the community for the community and does not include the Plasrefine plastics recycling facility. To paraphrase the "design principle of less is more," espoused by GHD…less Plasrefine and more community supported developments in our SHIP.