



BRUCE LUSCOMBE

OBJECT

Submission ID: 216857

Organisation: <i>N/A</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 2460</i>	
Attachment: <i>Attached overleaf</i>	

Submission date: 11/21/2024 9:00:04 PM

Please see attached.

21/11/2024

To Whom It May Concern,

I am writing to formally submit my objection to the proposed Plasrefine Recycling facility in the Southern Highlands. While I fully support the need to address the growing issue of plastic waste and recycling, I strongly believe that this proposed site is not appropriate for such a facility due to several significant risks to human health, the environment, and local communities.

The following reasons outline my objections:

1. Proximity to Residential Areas: The proposed facility is located within approximately 200 meters of residential areas. This places local residents at a high risk of harm in the event of a fire, which could result in the loss of life or injury to humans, animals, and wildlife.

2. Proximity to the Garvan Institute and Australian BioResources (ABR): The facility is located only 50 meters from the ABR, a world-class medical research facility focused on cancer, mental illness, arthritis, and other critical areas of health research. The proposed site poses a significant fire risk to both human and animal life, as well as potential disruptions to the breeding cycle of research animals at the ABR.

3. Close to Schools and Childcare Centres: Several schools and childcare centres lie within a 2 km radius of the site, including that which my grandchildren currently, and in the future, will attend. In the event of a fire or explosion, there is a potential risk to human health, particularly for vulnerable populations such as children, due to potential failure of water and air filtration systems.

4. Increased Traffic and Pollution: The facility will increase heavy vehicle traffic, which will contribute to noise pollution, air pollution, dust, vibration, and potential accidents. This could also harm wildlife, cause road degradation, and bring in invasive species.

5. Environmental Impact and Health Risks from Emissions: In the event of a malfunction or failure of filtration systems, the release of volatile organic compounds (VOCs) and other toxic emissions from the facility's stacks could pose significant health risks, including respiratory problems, cancer, and developmental disorders.

6. Threat to Local Wildlife and Habitat: The proposed facility will result in the destruction of critical habitats for several endangered species, including the microbat (listed on the EPA's red list), the platypus, the Southern Highlands platypus population, and other species such as the mountain grey gum and the southern myotis. Platypus in the Southern Highlands region have already been found to be declining in numbers: "There is rising evidence of platypus population declines throughout Australia..."¹ Adding microplastics into their ecosystem will be detrimental.

7. Proximity to Riparian Zones and the Wingecarribee River: The facility is located only approximately 10 meters from streams feeding into the Wingecarribee River. Any runoff containing microplastics or contaminants could pose significant risks to water quality, impacting both local ecosystems and the water supply for Sydney and Goulburn.

8. Fire Risk and Lack of Adequate Emergency Response: The Southern Highlands is served by small, volunteer fire services, with limited resources and response times. The extreme fire risk associated with plastic recycling facilities makes this site untenable, especially given the lack of nearby firefighting resources capable of managing such a disaster.

9. Impact on Local Economy and Tourism: The proposed facility is located near viticulture regions, agritourism attractions, and the historic Georgian village of Berrima. The construction of a heavy industrial facility in this location could harm the local tourist industry and devalue properties in the area.

10. Incompatibility with the Southern Highlands Innovation Park (SHIP): The SHIP precinct is designated for biotech, agri-research, and light industries. The proposed facility would undermine these goals by deterring innovative, sustainable businesses

¹ [Southern Highlands Platypus Conservation Project | Wingecarribee Shire Council](#)

from locating in the area due to the facility's high fire risk, heavy vehicle traffic, and potential environmental impacts.

11. Human Rights and Legal Concerns: The recently passed Human Rights (Healthy Environment) Amendment Bill (October 2023) obligates the government to protect citizens' rights to clean air, safe water, and a healthy environment. The proposed facility conflicts with these principles, and its construction may pose risks that contradict this newly enshrined right.

12. Long-Term Environmental and Health Concerns: Plastic recycling only delays the inevitable landfill problem, as plastics can only be recycled a limited number of times. Additionally, the emissions from the facility could introduce long-term environmental toxins, which have unknown but potentially severe health consequences. Microplastics that will inevitably be released into the air will have an impact on residents health: on microplastics, the EPA has published that "...some chemical additives in plastic have hazardous properties, such as persistence in the environment, accumulation in the body, and properties that may disrupt hormone function, damage the nervous system or cause cancer."² This is not something I want for myself, my community, but most importantly, my grandchildren. No one should be exposed to potentially fatal chemicals distributed through the air whilst being transported, processed, during opening and closing of roller doors. No one, human or wildlife, should be exposed to potentially fatal chemicals in their drinking water. This is a great risk to the wider community, those who access drinking water from our waterways, not to mention, the residents within 200m of this site, and the children (including my own grandchildren) who attend school within a 2km radius.

Given the combination of these factors, I firmly believe that the Plasrefine Recycling facility is unsuitable for this location. The proximity to residential areas, schools, vital

² NSW Plastics: The Way Forward DRAFT FOR CONSULTATION September 2024: references the following: 18 United Nations Environment Programme, 2023. Chemicals in Plastics: Summary and Key Findings https://wedocs.unep.org/bitstream/handle/20.500.11822/42505/Chemicals-in-plastics_Summary.pdf?sequence=1&isAllowed=y 19 Landrigan, P.J., Raps, H., Cropper, M., Bald, C., Brunner, M., Canonizado, E.M., Charles, D., Chiles, T.C., Donohue, M.J., Enck, J., Fenichel, P., Fleming, L.E., Ferrier-Pages, C., Fordham, R., Gozt, A., Griffin, C., Hahn, M.E., Haryanto, B., Hixson, R., Ianelli, H., James, B.D., Kumar, P., Laborde, A., Law, K.L., Martin, K., Mu, J., Mulders, Y., Mustapha, A., Niu, J., Pahl, S., Park, Y., Pedrotti, M., Pitt, J.A., Ruchirawat, M., Seewoo, B.J., Pring, M., Stegeman, J.J., Suk, W., Symeonides, C., Takada, H., Thompson, R.C., Vicini, A., Wang, Z., Whitman, E., Wirth, D., Wolff, M., Yousuf, A.K., & Dunlop, S., 2023. The Minderoo–Monaco Commission on Plastics and Human Health. *Annals of Global Health* 89(1):23, 1–215.

research facilities, and endangered wildlife habitats, as well as the inherent risks to our health, associated with plastics processing, makes this site unsafe.

I urge you to reconsider this proposal and choose a site that is more appropriate for the health and safety of local communities, the preservation of the environment, and the future of the Southern Highlands region. This is not the right site.

Thank you for considering my objection.

Sincerely,

Bruce Luscombe