



MIEKA WHITE

OBJECT

Submission ID: 216167

Organisation: N/A	Key issues: <i>Social impacts, Visual impacts, design and landscaping, Land use compatibility (surrounding land uses), Traffic</i>
Location: <i>New South Wales 2026</i>	
Attachment: <i>Attached overleaf</i>	

Submission date: 11/20/2024 2:51:31 PM

Please see attached my objection to the Moss Vale Plastics Recycling Facility

Dear Commissioners,

I am writing to express my objection to the approval of the PlasRefine plastic recycling proposal. The plastic recycling industry in Australia is still in its infancy, and the lack of formal classification and regulation for this industry raises significant concerns about the appropriateness of approving such facilities without clear standards in place. I am an accomplished Corporate Affairs professional with 15 years of experience in Stakeholder Engagement. For the last five years I have focused on community engagement in the renewables energy sector. Below, I outline the reasons why the Commission I am strongly opposed to the PlasRefine project.

Key Issues with the Plastic Recycling Industry

Lack of Formal Classification for the Industry

As a relatively new industry in Australia, plastic recycling has not yet been formally classified within planning regulations. Consequently, it is unclear whether it should be designated as a hazardous or noxious industry. This classification is essential to determine the appropriate planning and regulatory requirements for facilities of this nature. Without such a designation, the true environmental and public health risks remain uncertain, making it premature to approve proposals like PlasRefine.

Uncertainty Around Inadequate Asset Protection Zones

The absence of formal classification also means there are no established standards for safe areas between plastic recycling facilities and surrounding communities. Buffer zones are critical to minimising potential environmental and health impacts, such as air and water pollution, noise, and odours. A recently approved plastic recycling facility in Parkes, NSW, was prudently required to maintain a two-kilometre buffer from sensitive areas. This example demonstrates the necessity of taking a precautionary approach in the absence of formalised guidelines.

Lack of Regularity Framework

Without a clear regulatory framework, there is a significant risk of approving facilities in locations that may later be deemed inappropriate or unsafe for the surrounding environment and community. This creates avoidable risks and uncertainties for all stakeholders.

Implications for Environmental and Public Health

Plastic recycling facilities have the potential to generate pollutants, including microplastics and harmful chemicals such as PFAS that never break down, as evidenced by growing concerns in Australia and globally. Without established buffer zones and classification as hazardous or noxious industries where warranted, these

facilities may be placed dangerously close to sensitive ecosystems, water sources, or residential areas. In the case of the PlasRefine proposal, such risks are magnified by the absence of formal guidelines.

Lack of Community Approval

The key stakeholders in the local Moss Vale community have not been adequately consulted and have shown that they do not support the project. There is a large number of sensitive receivers that do not want this project built near them and there are many environmental interest groups that are strongly opposed to this Project. Social license is required for any State Significant Development (SSD) projects to proceed. The fact that the local Wingecarribee Shire Council is strongly opposed to the Project should indicate to this Independent Planning Commission (IPC) that the Project should not proceed.

To address these concerns, I urge the Independent Planning Commission to:

- Defer approval of the PlasRefine proposal until a formal classification for the plastic recycling industry is established, including its potential designation as a hazardous or noxious industry.
- Develop and adopt setback standards that reflect the environmental and health risks associated with plastic recycling facilities. These standards should be informed by scientific evidence, industry best practices, and community safety considerations.
- Apply a precautionary buffer zone of at least two kilometres for any new plastic recycling facilities, consistent with the approach taken for the Parkes facility, until formal guidelines are developed.

Conclusion

The absence of formal classification and standards for the plastic recycling industry creates unacceptable uncertainty regarding the environmental, health, social, and safety impacts of facilities like PlasRefine. Approving such facilities without these critical protections in place would be premature and irresponsible. I strongly urge the Commission to prioritise the development of appropriate regulatory frameworks before considering any new applications in this industry.

Thank you for your attention to this matter. I trust the Commission will act prudently to safeguard the environment and the community.