New South Wales Government
Independent Planning Commission

NAME REDACTED		**OBJECT**	Submission ID: 215040
Organisation:	*Southern Highlands Landcare Network*	Key issues:	*Land use compatibility (surrounding land uses),Other issues*
Location:	*Redacted*		
Attachment:	*N/A*		

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Southern Highlands Landcare Network is an independent; not-for-profit network that supports Landcare activities as well as other environmental groups and individuals with a common purpose to work together in the Southern Highlands to care for the environment.

We object to the Plasrefine proposal due to

â€¢ no Environmental Impact Assessment on the proposed north-south access road' and Braddon Rd intersection, that addresses the their impact to the area's riparian zones; and

â€¢ micro plastics entering the Wingecarribee River impacting platypus and other fauna that rely on the river, Sydney's drinking water, and our swimming, fishing and kayaking spots.

Detailed Information - Impacts to the area's Riparian Zones

The Plasrefine site is located in the Southern Highlands Innovation Park (SHIP). The SHIP precinct and surrounding area comprise a network of watercourses dotted with dams, providing important corridors and habitat for riparian dependant fauna such as turtles, amphibians and reptiles.

It is noted the SHIP Masterplan has been designed to protect the precinct's riparian zones. It's also acknowledged that the Plasrefine development proposal has attempted to protect riparian zones within its footprint. How effective the protection will be is dependent on the detailed plans and their implementation.

But there is another side to this development, the proposed â€˜north-south access road' required to service the Plasrefine development.

The road will be carrying a large volume of heavy vehicles and it appears it's only required to support this specific development.

It, particularly the southern end and Braddon Rd intersection, impacts the same riparian zone that the development proposal is trying to protect but there doesn't seem to be an Environmental Assessment on the construction and operation of this road.

What impacts will the road have on the riparian zone?

How will adverse impacts be managed?

The environmental impact of the road design, construction and operation needs to be fully and appropriately assessed and addressed before a decision on the Plasrefine Development proceeds.

Detailed Information - Micro plastics entering the Wingecarribee River

We note studies of a state-of-the-art recycling plant in the UK, undertaken by the University of Strathclyde in Glasgow, found that 6 13% of the plastic recycled was released into wastewater.

We are concerned about a similar release of micro plastics into the Wingecarribee River and its catchment if the Plasrefine facility proceeds.

There doesn't seem to be information, the lay person can understand, on the extent of micro plastics expected to be discharged into the waste water by Plasrefine's operations, we just know they will be. (Source Development Consent Condition B39d references reducing microplastics in wastewater being released into the sewer).

We are also concerned with the potential of micro plastics entering the terrestrial environment through the use of sewage sludge bio solids as fertilisers.

â€¢ Are there wastewater emission standards, that specifically target microplastics as a contaminant of concern, in place? If not, why not. If so, how do the standards compare with world's best practice?

â€¢ Is a Broadscale Microplastic Assessment (BMA) or similar proposed for the Wingecarribee River Catchment to obtain baseline data on micro plastic levels? The NSW Government is undertaking this in 120 estuaries, but it appears not for inland water ways.

These are just a few questions that come to mind regarding the management of micro plastics in our environment

Renown water expert Dr Ian Wright Associate Professor of Environmental Science at Western Sydney University has raised issues regarding the current health of the Wingecarribee River and in his opinion the poor licensing. (Sourcehttps://au.news.yahoo.com/council-discharges-treated-sewage-into-sick-aussie-river-that-feeds-citys-water-supply-020011053.html).

Additionally it has been reported that scientists from Western Sydney University have found some of the highest concentrations of perfluorooctane sulfonate (PFOS) of any species in the world, in livers of deceased platypus. One of the tested platypus came from the Wingecarribee River Berrima, downstream from the proposed Plasrefine site. It had the second highest concentration level of PFOS in its liver. (Source https://pfas.australianmap.net/20-8-24-wingecaribee-river-berrima-nsw-pfos-in-platypus/).

We are concerned that the levels of micro plastics released due to Plasrefine operations will accumulate and exacerbate the environmental stressors and health of the Wingecarribee river impacting the platypus and other fauna that rely on the river, Sydney's drinking water, and our swimming, fishing and kayaking spots.

The precautionary principle needs to be adopted due to the uncertainties surrounding micro plastic contamination from plastic recycling centres, we don't want the Wingecarribee River catchment to become a toxic micro plastics hot spot.

Yes we need plastic recycling. We also need to protect our waterways and riparian zones from micro plastic contamination.

It's not the right site.