



TESSA MANNING

OBJECT

Submission ID: 216378

Organisation: N/A	Key issues: <i>Social impacts, Land use compatibility (surrounding land uses), Traffic, Other issues</i>
Location: New South Wales 2575	
Attachment: N/A	

Submission date: 11/20/2024 7:22:42 PM

I object to the proposed Moss Vale Plastics Recycling Facility on the following grounds:

1. Not the right site

The proposed location for the facility:

- is within 150m of residential properties;*
- lacks a buffer zone with a medical research facility, two schools and a childcare centre;*
- is in a riparian zone in Goulburn and Sydney's drinking water catchment;*
- lacks appropriate transport infrastructure to ensure a safe transport route for trucks;*
- very close proximity to the Garvan Institute and*
- is not zoned as a heavy industrial zone.*

Although I am not opposed to plastics recycling facilities generally (and believe them to be necessary), this facility should be located in a heavy industrial zone to minimise risks to local residents and to the environment.

2. Impossible to manage fire risk at this location

Fires at recycling facilities are common, often due to batteries or other combustible materials. In the event of a fire, Plasrefine proposes to use local crews at Moss Vale, Bowral and Mittagong. Only Mittagong has a hazmat truck. If necessary, additional resources will come from Wollongong and Campbelltown some 45 minutes away, if they are ready and available.

As described in a FRNSW report on a recycling plant fire in Sydney, "the heat release rate of plastic is 39.85 Kj/g which is almost as great as burning propane" (Fire & Rescue NSW News Journal June 2015, 10th Alarm Lansvale Plastics Recycling plant fire, pg. 15, Operations notes). This is why fires at waste facilities in NSW have historically been large, fast growing and required significant fire brigade resources to extinguish. I am concerned that the Wingecarribee Shire does not currently have sufficient fire-fighting resources for a fire of this type.

The lack of separation between the proposed location and residential properties and local waterways combined with inadequate fire-fighting resources in the immediate vicinity poses a significant risk to properties and our waterways in the event of a fire at the facility.

3. Management concerns and potential environmental risks

Plasrefine Recycling is a company that has no history in Australia. It is not clear who the operators of the site will be and whether the operators of the site are appropriately qualified and experienced.

Plasrefine has provided an Environmental Impact Statement (EIS), which was prepared by GHD in January 2022. Although the proposed processes are not expected to result in air or water quality risks, my concern is about failure of those processes.



Additionally, some EPA conditions such as how materials are to be stored are unclear. Research shows that storing plastics in exterior storage compounds before they are processed can almost double the microplastic generation during the shedding step in the recycling plant.

If an incident occurs, the location of the site in a riparian zone and in close proximity to a residential area presents an unacceptable risk to residential safety, and air and water quality.

I ask that you DO NOT APPROVE the Moss Vale Plastics Recycling Facility at this location.

If, however, you do approve the facility at this location, I ask that you provide the new Wingecarribee Shire Council with an appropriate amount of time to engage an expert to prepare a list of conditions that should be imposed on the approval. Such conditions could include, but are unlikely to be limited to:

- 1. Confirmation from the NSW EPA that the proposal meets all current environmental protection regulations, including in relation to air and water quality.*
 - 2. A comprehensive fire risk mitigation plan be developed and approved by NSW Fire and Rescue.*
 - 3. A potential reduction in the amount of materials that are to be stored on site at any one time and confirmation about how materials are intended to be stored (particularly if they are to be stored inside or outside).*
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