



ANNA PHILLIPS

OBJECT

Submission ID: 217568

Organisation: N/A	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 2577</i>	
Attachment: <i>Attached overleaf</i>	

Submission date: 11/24/2024 8:48:57 AM

Please see attached my PDF submission. Thank you Anna Phillips

Plasrefine Plastic Recycling Reprocessing Objection –

Water

In late 2021 I attended a meeting presented by GHD on behalf of Plasrefine they presented lots big ideas, glossy plans and how fabulous Plasrefine was going to be for the war on future plastic recycling.

After hearing about the proposed daily water usage required for this factory which in 2021 was estimated to be 40,000 litres per day & now in 2023 has been revised by GHD to be up to 15,500 litres per day I addressed a question to the GHD team.

“ Where will ALL the water Plasrefine requires come from?

The Reply - it will be sourced from rain tanks as part of the operation”!

My reply “What if it doesn’t RAIN! No answer came?

Seriously GHD how could such a corporation insult our intelligence with this answer!
Here began my fight to stop Plasrefine.

In the Current DPHI Development Consent document October 2024 there is no mention of the amount of water that would be taken from our potable water source during drought.

This is rural farming, agricultural land & it is evident that at this time in 2021 our community had more knowledge about our rain cycles than GHD.

El Niño is now unfortunately part of our future forecast weather & dry/drought cycles will continue over the decades ahead. At the beginning of 2020, 100% of NSW was in drought. The overall message from the new modelling is that our water supplies in NSW could be less secure than we thought. Our weather is now unpredictable and unstable.

Then you also have catastrophic fires sadly as the Southern Highlands had in the summer of 2019/2020 - what fights bush fires **Water Is One!**

I have asked the question recently “who gets priority over town water at times of water restrictions”? It is my belief that industry does!

Then what happens should Plasrefines water recycling fail/breakdown and they require excess town water supply?

I also ask WHO will monitor the proposed water usage of Plasrefine?

The Southern Highlands is a loved tourism destination, wedding destination, people come here for our beautiful green countryside, tulip - time and our vineyards. Especially as the Southern Highlands is 1-1.5hrs away from Sydney.

Water is so precious and vital for our survival as humans, the bees, animals, agriculture, viticulture & I do love my home grown vegetables.

They All Need Water!

As a food educator for over 40 years I have always championed the idea for people to grow some produce to supplement their food. And with the economy currently as it is my vegetable garden is a seasonal focus for me. The thought of not being able to water is just one horrific element that terrifies me – with fine micro plastics in the air from Plasrefine as if anyone would grow backyard produce.

In Albury an established Circular Plastics Australia Recycling Facility has an environmental considered process that does not use water on large volume capacity. Sounds like a responsible environmental business model to me.

Then there is the high risk of water pollution from micro/nano plastics and in the case of a fire PFAS within fire fighting retardant. **I am not alone in thinking that the RISK here was so HIGH that Sydney Water and NSW Water would have said absolutely NO to this Plasrefine proposal yet here we are.** Since 2019 there have been 19 Plastic Recycling Facilities fires in Australia.

Threat to drink water – Southern Highlands, Sydney and Goulburn

With three riparian water - courses on the proposed site for Plasrefine it absolutely is incomprehensible that NSW Water and Sydney Water would play Russian Roulette with such a precious resource.

The Wingecarribee River is a major water resource for Warragamba Dam – Sydney's drinking water catchment.

Fire

In the DPHI's Development Consent page 41

Under Mitigation measures FS3 – Fire and incident management

Fire Risk

It states prior to commencement of operations, the following will be developed

- An operational plan for stockpile management, with a copy to be included within the Emergency Services Information Package
- An Incident Response Management Plan for staff and other persons at the facility in the event of a fire
- An Emergency Services Information Package for firefighters in accordance with the FRNSW guideline

WHY should something so potentially catastrophic be addressed **after approval!** We all know it's not **IF but WHEN** a fire may happen.

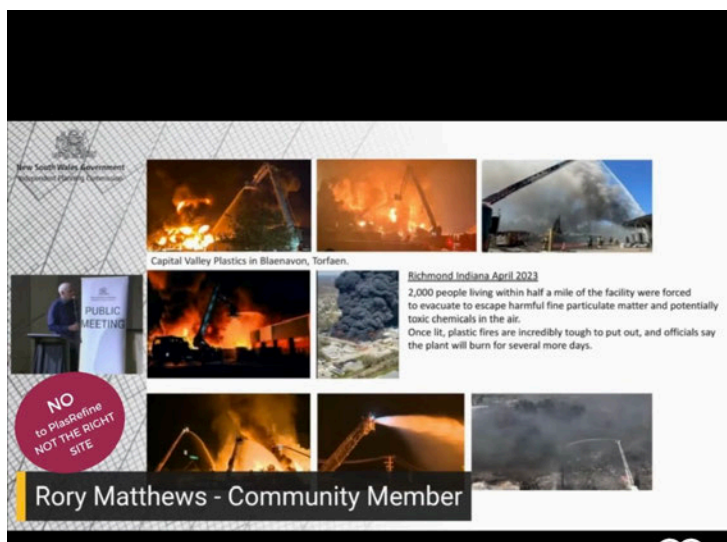
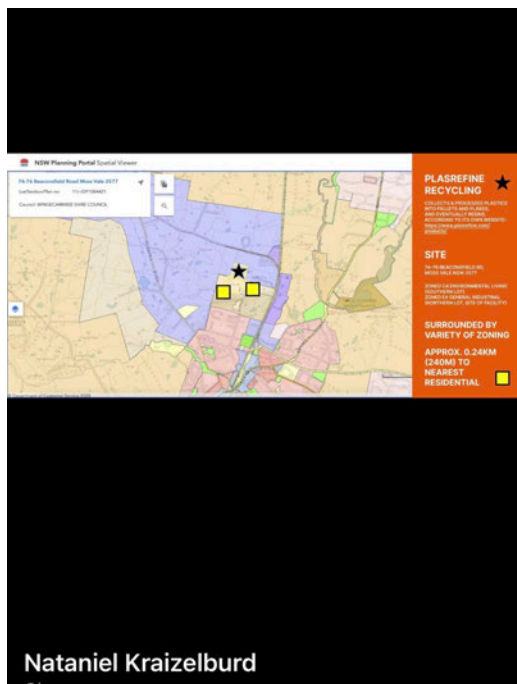
“There is very limited fire fighting capability in the Southern Highlands to satisfactorily manage with the sheer size and scope of the potential fire in a multi story plastics recycling reprocessing factory of this size with the potential fuel load of up to 20,000 tonnes of plastic waste material stored on site at any one time.

Our local Fire and Rescue has four stations with six fire fighting appliances across the Highlands. Generally the stations are unmanned with 3 crews per station on call.

I believe there is an agreement between the Fire and Rescue and the RFS to mutually support each other in the case of structural fires (most usually these are house fires). The local RFS does have five volunteer staffed brigades with breathing apparatus capability.

Additional Fire and Rescue vehicles would need to travel from Campbelltown, Shell Harbour or Goulburn all between 45 and 60 minutes away. Fire and Rescue aerial equipment designed for dealing with fires in larger multi story buildings or large industrial buildings is generally located closer the area of need in the major high rise or industrial centres of the Sydney metro area over 90 minutes away from the proposed site.

I note that the proposed Plastic Recycling Facility Brightmark Site that is being jointly funded, by NSW State Government has a Hazmat team on site or available. This site is also within an industrial area in Parkes NSW with a Buffer Zone. A few plastic recycling facilities I research in Australia are approximately 2 kms from the nearest homes – **NOT 200 metres!**



On Tuesday 11th November 2024 when David Gamble from GHD was being asked questions by the Commissioners regarding lithium batteries. His reply was “that as the plastic was pre - sorted that any batteries would be removed prior to arriving at the Plasrefine Factory – what an insult to anyone’s intelligence. I ask Mr Gamble have you ever seen the size of a hearing aid battery? Perhaps a more expected reply from a company such as GHD was that the factory would have some state of the art metal detector for lithium batteries?

A recent fire in Tweed Heads states that Fire Fighters there are very concerned about lithium batteries in home recycling bins.

DPHI – Process Description states

“Any recyclable materials not suitable for further processing would be removed within 14 days to other recycling facilities. Non-recyclable materials would be stored within storage bays in Building 1 until they can be taken for disposal at a licensed facility (landfill)”.

What measures does Plasrefine proposed to ensure this waste will not contain Lithium batteries given the proposal to store non - recyclable waste for 14 days? Here’s an obvious FIRE RISK.



* Tweed Valley Weekly Nov 2024 re lithium batteries

In addition David Gamble talked about an underground water tank that would store water in case of fire. At no time it would seem is this mentioned in any earlier documents from GHD (so again they get to add what they like to tick a box!) – what about the water table when installing such a tank and the possible contamination of ground water.

In the event of a catastrophic fire the evacuation itself of our community is TERRIFYING especially should it occur at night as Plasrefine is proposed to be a 24 hour operation. HOW ON EARTH would we the community know a Town Bell ringing?

The toxic smoke and chemicals we all know what will happen there – it will without any doubt fall into natural riparian water ways that feed into the Wingerarrabee River then onto Warragamba Dam Sydney’s drink water catchment for over 5 million

Bush Fire Zone

There is more evidence I am sure from other submissions however I must add this as a major concern that the proposed site for Plasrefine in November 2024 is now classified as a bush fire zone by the RFS. Just because it wasn’t 10 years ago when Plasrefine brought the land it is NOW. Facts are facts!

Stacks/Vents

Call them stacks, vents, emissions towers – so many names given to them by GHD over the 4 years in the latest DPHI Plasrefine Assessment Report Page 23

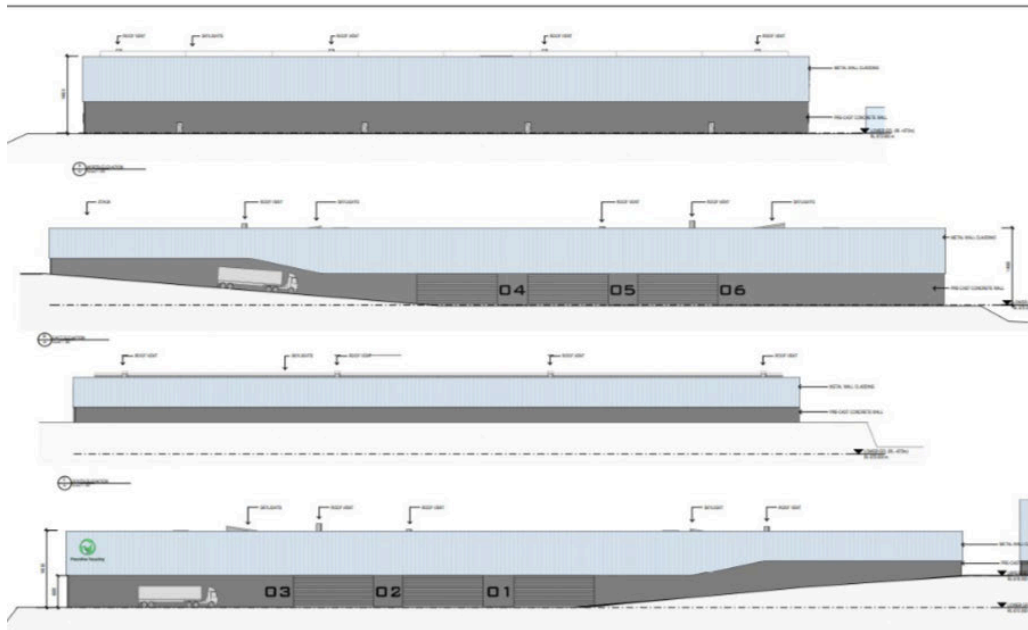


Figure 8 | Site layout Building 1 Elevations

This is the extract from Sharan Kennedy’s (an integral person within the Moss Vale Matters Community Group) IPC’s meeting presentation. In Sharan’s words she had to dig deep to find recent information regarding the emissions stacks.

“There are 4 emissions stacks and 33 rooftop ‘vents’. This information was not readily available in one easily accessible location. This information 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.”

I ask if a property developer or home - owner builder left such critical and vital details out of architectural plans when submitted for a DA would this not be a chargeable offence for being misleading? In addition at the IPC Meeting Monday 28th October a question was put to GHD regarding the stacks and answered was that there were 2 when ask by the commissioner! I strongly request that the IPC seek final clarity from GHD is it **2 stacks or 4!!**

The Southern Highlands Innovation Park

The SHIP master plan was within the future regional plans of Wingecarribee Shire Council well being before Plasrefine brought the current land. The State Government and Dept of Regional NSW provided a grant of \$270,000 for a Master Plan.

DPHI report states that 'the draft SHIP vision and Master Plan is currently being prepared. This is both incorrect and misleading the master plan and vision has been developed and exhibited through council and finalized. It is stated that the SHIP Master plan is expected to be adopted by the end of 2024. I am unsure if this timeline is currently still correct given the IPC decision. The SHIP should be allowed to be adopted and proceed and not be overridden by Plasrefine's poor investment decision and lack of due diligence.

I personally attended every meeting with the consultants and council in regards to community engagement regarding the SHIP. I also asked on every occasion were both State Project Teams aware of each other that being the SHIP team and DPHI – and the answer was YES. Clearly not as there has been no reference to the SHIP in the DPHI documents.

I was so impressed & excited with the consultation process and the engagement with our community – local jobs will definitely be created with the future Innovation Park.

This extract is from the SHIP Innovation Park Master Plan (Page 19)

"There is support for industrial uses such as waste recycling, but these uses need to be located in the appropriately zoned land. Plasrefine, as an example, is a plastics recycling facility proposed to be located on an E4 General Industrial zoned lot when this use is more aligned to E5 Heavy Industrial and should be located accordingly".

Trucks and Traffic

The very thought of the Plasrefine trucks moving from the freeway through New Berrima is completely insane. The estimated 50 trucks Monday – Friday in and out so 100 truck movements and that's just trucks with plastic to recycle and repurpose delivering to Plasrefine. There is absolutely no TRUST that this will be the case. Again I remember asking at a GHD community session how will they monitor the trucks staying on their designated route – the answer from GHD was "That will be up to the council" and you wonder why we don't believe a word GHD says!

Then there is the absolute farce that GHD has played with all the proposed truck routes over the last 4 years to access the Plasrefine site.

What measures has Plasrefine proposed to limit microplastics leaving the facility on the wheels of the trucks?

What pollutant traps are proposed for the roads entering the site to limit waste or microplastics entering the environment?

If they can't even work out how to get trucks in and out of the site how on earth can they be trusted to get such a complex and hazardous process right?

Social Impact Assessment – Ethos Urban 2023

I attended this research session and **I clearly understand now why** younger residents were not at these meetings. It's due to the extremely poor, manipulative community engagement by GHD, add to the situation that we had no council and were under Administration and then there was Covid – what a mix. I am so very proud of our community the way they have rallied since the 11th October when an email arrived stating the DPHI had Recommended Development Consent for Plasrefine. As of Monday 14th October our community rallied for TV media over 100 people, next came a community information evening with 400 community residents and from then 1,000's of Southern Highlands residents now know about Plasrefine and have united to stop Plasrefine being built in the Southern Highlands. We the Moss Vale Matters Group have informed our community – these extraordinary humans have been printing their own flyers & walking the streets to tell everyone about the hazardous possibility of a plastic recycling factory in Moss Vale. They moved here for the lifestyle, country and clean air and many have young families. I am so proud that the future of the beautiful Southern Highlands is in their hands!

This is the extract from the SIA - Page 53

“Age Structure: The Study Areas have an ageing population, with a median age of 47.2 in the SSA and 48.1 in the TSA, remarkably higher than the NSW median of 38.8 years. In particular, the Study Area has a high share of residents aged 70-84 years (17.4%), when compared to NSW for the same age group at 10.0%. This age group also represents the largest age group within the Study Areas, followed by 60-69 years age group which accounts for 14% of the resident population”.

Mental Health

What GHD and Plasrefine have made this amazing community endure over the past 4 years has taken its personal toll especially with extreme distress for those residents that live within 200 metres of this proposed plastic reprocessing factory.

Once again following the IPC meetings we have GHD changing figures and information regarding truck movements on Tuesday 11th November David Gamble stated that the roller doors could 'probably' be open up to 5 hours in the day for truck arrivals and departures. Then on Monday the 18th November its revised to 42 minutes – REALLY wow must be amazing truck drivers that reverse in when their fast acting roller doors open. What about OHS?

How do they explain this? I believe they should be made to prove this is possible with a practical simulation – no more desktop analysis.

Layer upon layer of stress and anxiety has been placed on this amazing community over the past 4years more so since the 11th October 2024 with originally the 7th November **That Is 28 DAYS** being the closing submission date before an extension was granted until the 25th November. **Wow no pressure!** Our community has dived full on TO FIGHT into documents (on forever chemicals, nano plastics, wind directions, water, fire, platypus, environment, truck movements, roads, roller doors (**seriously**) research, facts and lies that are all part of the GHD/Plasrefine proposal and every changing information. No TRUST and HUGE Mental health impacts on many in our community.

Two previous NSW Major Projects Submissions periods over the past 4 years allowed our community just 28 days to research, decipher and fully understand the risks of Plasrefine. Each time our submission total was approx. 350.


With the current submissions for the IPC process total at 1,544 from 11th October to 14th November and not closing until the 25th November, it has to be very clear to the NSW State Government that GHD's stated community engagement was a Farce. Add to that the 135 people that spoke at the IPC three meeting days.

In Conclusion

This Plasrefine Recycling & Repurposing Factory could **go absolutely anywhere!** Unlike a coal or gold mine these facilities need to be near the resource – **NOT THIS ONE!**

Premier Chris Minns told me to TRUST THE PROCESS when I spoke to him on Monday 14th October 2024 when on air with ABC Sydney Radio. I have absolutely NO TRUST in our NSW State Government as we have rallied as a terrified, angry and frightened community full of knowledge now about the risks of Plasrefine. This is not a dictatorship we live in, DPHI you also gave us just 13 days to register to speak to at the IPC Meetings – outrageous.

THE PROCESS Premier Minns that we have calculated that GHD/Plasrefine have had 1,140 days over the 4 year period to respond to documents and questions and the people OUR community of the Southern Highlands has had 86 days to read and respond – Fair I think NOT.


Recycling – Tick a Box Really?

The DPHI's Vision statement is 'ensuring that NSW is liveable and prosperous by delivering thriving communities, public spaces, places and economies'. REALLY where does Plasrefine sit in this statement?

I implore the Independent Planning commissioners to see what we the community see & know – the **RISK IS TOO HIGH!**