



**CHRISTINE DUCKER**

**OBJECT**

Submission ID: 217724

Organisation: N/A	Key issues: <i>Land use compatibility (surrounding land uses)</i>
Location: New South Wales 2576	
Attachment: N/A	

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*While there is general agreement that Australia must develop an onshore plastics recycling industry, the technologies that are proven to be effective without endangering human health or having adverse environmental impacts are yet to emerge. What has emerged is increasing evidence from overseas recycling plants that plastics recycling poses extreme danger to human health and the environment from current recycling processes. There is a range of reasons for the dramatic increase in serious incidents at overseas facilities but the escalation in the number and scale of these incidents and the extensive damage they cause, including death, is proof that the location of these facilities must be at least a considerable distance from the nearest human habitation, yet within easy reach of specialist teams to deal with catastrophic incidents. In this regard the proposed site of the Plasrefine facility is located within a declared fire zone. It would be reasonable to think that the fire risk will increase with climate change. The proposed site is dangerously close to residential areas including schools, Australian BioResources, which is the Garvan Institute's biomedical research facility and to local horticulture and cattle farming areas. The site is within the catchment area for Sydney's water supply, as well as the surrounding local areas.*

*The Rural Fire Service was not consulted in relation to this proposal. There are no services available in the Wingecarribee Shire within an hour's travel that could handle a chemical fire of any size and the danger to local residents from an incident is unthinkable. The prevailing south-westerly winds would blow the smoke across the main residential area of Moss Vale and then across to Bowral, which is the most significant residential area in the Southern Highlands. These significant risks have been identified by the Wingecarribee Shire Council in their submission to the IPC.*

*The number of truck movements modelled by GHD, representing the owners of the proposed facility, operating 24 hours a day and 7 days a week, is distressing for those living in small residential streets near the proposed site, both for noise, road congestion, and pedestrian movements including nearby schools.*

*Of significant concern for this proposal is the emerging research on the danger of current plastics recycling processes. Research by Professor Madya Dr Haliza Abdul Rahman, head of Laboratory at the Faculty of Medicine and Health Sciences at the Universiti Putra Malaysia has identified the significant respiratory and carcinogenic effects of airborne pollutants from plastic recycling for nearby populations. She believes that recycling facilities should be located at least 6kms from the nearest inhabitants. Professor Hans Arp at the Norwegian University of Science and Technology is an expert on environmental pollutants. His research provides evidence that the adverse effects of the over 4,000 toxic chemicals in plastic are greatly increased during the recycling process, that they are carcinogenic and can cause extreme endocrine disruption in nearby inhabitants. In addition to airborne pollutants, there will be toxic discharge, or at least a serious risk of toxic discharge, which will affect the local water supply and eco-system habitats. There is a great deal of research being undertaken in many countries into the impact of plastics recycling but the conclusions are all similar, that current plastics recycling processes carry significant human and environmental risks for people in nearby communities. The view emerging from much of this research is that there is no completely safe way to recycle plastics, which imposes on government the responsibility to address this matter carefully and in a way that minimises the potential impact of these risks. The CSIRO is also undertaking relevant research and of particular*



interest to Australians is the Solving Plastic Waste Cooperative Research Centre, which was established only on 1 July 2024, with a 10 year program to address current problems across the plastics value chain.

The significance of research findings does not appear to have been adequately considered, or indeed considered at all, by the approving authorities, and this view was reinforced by the presentation to the IPC at its final hearing on 12 November 2024, [REDACTED] failed to address the matters of land use conflict, fire events and micro plastics pollutants raised by the Commissioners in their questioning. The seemingly lackadaisical approach [REDACTED] enraged the community members present at the hearing, when it was suggested that landscaping would mitigate the land use conflicts and there would be "codes of conduct" for traffic management. [REDACTED] stressed that they relied on "subject matter experts in other government agencies", but one must question whether any such experts exist in Australia. The two presenters failed to confirm that there had been sufficient investigation of the community issues, traffic problems created by the facility, environmental hazards, and the capacity of the local council to manage stormwater, fire, traffic movements, noise and other pollutants that would seriously disrupt the local community. Ms Laguna stated that they had recommended that monitoring would be carried out after the facility commenced operations to understand the impact of these matters and adjust controls if required. It is not unreasonable to expect our government to carefully consider the impact of a significant toxic, environmental and community hazard on its citizens prior to approving the project, rather than allowing it to proceed and attempting to address problems as they arise in the future. How many people's lives will have been adversely affected by that time? Sorry, that is too late and displays an appalling level of arrogance and disregard by government employees, who will not personally suffer from the effects of the facility, for the citizens of the Wingecarribee Shire, and a high level of ignorance of the reality of plastics recycling. Despite statements by Ritchie and Laguna that there had been consultation, the community believes there has been very little consultation, and nobody has been able to substantiate that consultation. Apparently some level of consultation was undertaken by GHD, but that company is highly conflicted in this matter. "Independent assessments" were apparently carried out in-house by GHD. GHD fails the "fit and proper person test" in this matter, as do the owners of the proposed facility.

Suggestions by [REDACTED], that the NSW EPA considered that the impacts of the facility "could be managed", revealed that a buffer zone had never been considered, that planting more trees would resolve the issues. Traffic impacts on the local area, the town of Moss Vale and the surrounding main traffic thoroughfares had not been considered. The level of ignorance is astonishing.

The last issue, and possibly the most important, is that the owners of the facility by their own admission have no experience in plastics recycling, at least of the nature proposed for the Moss Vale site. For any community, this is entirely unacceptable, having regard to the extremely toxic nature of the process, the significant risks for human health and life and the environment, the disruption and distress to a small local community living in an otherwise pristine area highly regarded for its natural beauty and the lack of evidence and research to support the proper management of the process and the facility. This proposal reflects a disgraceful lack of diligence and competence by the department officials charged with protecting the NSW community. If we are to have a plastics recycling facility in New South Wales, then all of the above risks need to be taken into account.

We sincerely hope that the Commissioners will address the failures of the NSW public service in regard to this project.

Kind regards

Christine Ducker AM

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