



GAYE WHITE

OBJECT

Submission ID: 217424

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

Submission date: 11/23/2024 3:06:35 PM

See attached file.

Dear Commissioners,

I am writing to express **my strong objection to the proposed PlasRefine Plastic Recycling Plant in Moss Vale**. My concerns centre on its inconsistency with zoning regulations, inadequate environmental safeguards, and significant health and social risks, compounded by the lack of comprehensive oversight and regulatory standards for this emerging industry.

1. Zoning and Land Use

The proposed development site is zoned E4 General Industrial, intended for light industrial uses, warehousing, and logistics. The PlasRefine facility's substantial processing capacity of 120,000 tonnes annually and its emissions profile align more closely with E5 Heavy Industrial zoning. Such zoning is essential to mitigate the environmental and health impacts of heavy industrial activities and to ensure these facilities are adequately distanced from sensitive land uses.

The facility's proximity to C4 Environmental Living-zoned areas further underscores its incompatibility. This zoning aims to preserve the ecological, aesthetic, and residential character of the area, objectives that are clearly at odds with the proposed industrial operations.

2. Environmental and Health Risks

a) Air and Water Pollution

The Environmental Impact Statement (EIS) estimates emissions of 90,000 tonnes of CO₂ equivalent annually, far exceeding the NGERs reporting threshold. Such emissions make this project unsuitable for the area, which has a significant rural-residential focus. Moreover, plastic recycling poses risks of releasing microplastics, per- and polyfluoroalkyl substances (PFAS), and volatile organic compounds (VOCs) into air and water systems.

The NSW Environment Protection Authority (EPA) has publicly acknowledged critical gaps in knowledge about microplastics and their long-term environmental and health impacts. The EPA's funding of research into these gaps highlights the risks of approving facilities such as this without a fully informed understanding of their consequences.

b) Water Resource Concerns

The Hume Coal proposal, located a short distance from this site, was refused partly due to unacceptable risks to groundwater and Sydney's drinking water catchment. Similarly, the PlasRefine facility's processes and its waste streams could potentially harm local aquifers and water sources, exacerbating concerns about water resource security in this sensitive area.

c) Lack of Adequate Buffer Zones

NSW regulations for similar facilities have required substantial buffer zones, as seen in the Parkes plastic recycling facility's two-kilometre buffer to minimise community impacts. The lack of such safeguards in the PlasRefine proposal is deeply concerning, particularly given its proximity to residential and environmentally sensitive areas.

3. Social and Land-Use Compatibility Issues

The **NSW Independent Planning Commission's refusal of the Hume Coal project highlighted incompatibility with local land uses, including agriculture, tourism, and residential areas.** The PlasRefine proposal similarly conflicts with the character and aspirations of Moss Vale, which focuses on sustainable rural industries and community well-being.

The approval of this project would negatively affect residents' way of life and property rights, fostering stress and social disruption. These impacts mirror the adverse social effects identified in the Hume Coal decision.

4. Regulatory Gaps in the Plastic Recycling Industry

The plastic recycling industry in Australia is yet to be formally classified under NSW environmental laws. This lack of classification results in regulatory uncertainties, particularly regarding emissions control, waste management, and buffer zones. It is premature and irresponsible to approve this facility in the absence of such standards.

Recommendations

In light of these issues, I urge the Commission to:

1. **Defer approval** of the PlasRefine proposal until formal classification and standards for the plastic recycling industry are established under NSW law.
2. **Conduct a comprehensive review** to identify an appropriate E5 Heavy Industrial location for such facilities.
3. **Require a detailed risk assessment** to address emissions, chemical by-products, and impacts on residential and ecological zones.
4. **Consider local precedent** in rejecting developments, such as the Hume Coal decision, which did not achieve an appropriate balance between environmental, economic, and social considerations.

The Commission's decision regarding the Hume Coal project demonstrated a commitment to safeguarding the public interest. I urge you to apply the same rigorous standards to this proposal, ensuring that the health, environment, and character of Moss Vale are protected.

Thank you for considering this objection.

Yours sincerely,

Gaye White