



LYNETTE SAVILLE

OBJECT

Submission ID: 217888

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

Submission date: 11/24/2024 10:38:54 PM

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The Independent Planning Commission NSW

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Submission to the Planning Commission

Re: Moss Vale Plastics Recycling Facility (SSD-9409987) Plasrefine.

To whom it may concern,

I appreciate the opportunity to write regarding the proposed Plasrefine plastic waste facility.

Background

The extensive, rigorous, diligent processes and community consultations undertaken by Wingecarribee Shire Council to develop its LEP and the Southern Highlands Innovation Precinct are respected and commended. The design, rationale and aspirations of the LEP must be upheld and respected, otherwise dangerous precedent is set for any local government in NSW.

The need for recycling in the right location is acknowledged. However the location of the proposed Plasrefine facility, a potentially hazardous industry, with risk of harms to environment, riparian zones, watercourses, health, and adverse social effects is controversial, is opposed by the local community. It is also near and upslope of bushland, rural and agricultural lands, the foodlands, important food security essential for a sustainable Sydney. Sited near watercourses which flow into Sydney's water supply catchment, it is fundamental and critical that this water supply is not disrupted or contaminated.

Members of the community, with substantial local knowledge are extremely distressed by the potential effects from the proposal.

The commissioners are respectfully requested to re-consider and refuse the proposal in this location, to act in the public interest and apply the Precautionary principle (EP and Act).

Location:

In dispute is the location, scale, appropriateness, potential harm and risk to health, the environment and fire.

The bulk and scale of the proposed waste facility, close to established residential areas, schools and child care centres is controversial. The proposed facility is intrusive, visual amenity will be degraded by two very large warehouses and three ancillary buildings, visible from surrounding areas. There is risk of fume and odour affecting community amenity and lifestyle.



Construction and operation will cause noise, vibration, with risks of disturbance to and adverse effects to the adjacent Garvan Institute, which is internationally renowned and respected, for its highly technical and advanced cancer research on mice to develop cures. The mice are extremely sensitive, with risk they will be affected by factors such as noise, vibration and pollutants.

Fire risk is associated with plastic recycling.

Operation of Plasrefine facility

Plasrefine is a high impact project for the nation. It aims to construct and operate a plastic recycling facility to recycle and re-process 120,000 tonnes of plastic waste per annum from all over Australia. It aims to sort plastics into different types, re-processing polymers, plastics, and convert to pellets and flakes.

Clarification is required with regards to potential development 'creep', potential stockpiling on site, and whether plastic waste may be imported in the future. Given the scale of the proposed facility, questions have been raised whether the assessment should be a federal matter.

Clarification is required whether Plasrefine will use plastics for energy recovery use. Anticipated volumes and methods, and conditions should be clarified.

Plastic waste incinerators release toxic air pollution associated with high risk cancers. Clarification is required whether, and to what extent, incineration will be used on site. Historically waste incineration may not reach the temperatures required to remove toxins, dioxins and PFAS (1.200C for dioxins). Stringent monitoring would be required. Incineration may result in more toxic pollution than landfill disposal.

Risks to the natural environment

The proposed facility is located upslope and near environmentally sensitive watercourses, ecosystem services, critical ecologically significant areas, with high environmental values. There is risk that run off from waste facility would have detrimental effect on the ecology of the local area, endangering wildlife, biodiversity, riparian zones, aquatic life including platypus with potential degradation and damage downstream, including to Sydney's water catchment.

The health and well-being of the community, the pristine environment and ecosystems on which life depends need protection. Australia's wildlife is already in serious decline due to factors including habitat loss, invasive species, chemical contamination and loss of habitat, some factors of which are associated with this proposal.

Throughout their life cycle from production to disposal, plastics release micro-plastics and nanoparticles that can affect human health. Plastic products contain oil, gas, and chemical additives that may cause serious health problems during manufacture, while recycling releases these toxins and odour into the local environment, threatening those working with the materials, those living nearby, subsequently the wider community, environment, ecosystems, air, water, soil.

Long term accumulation of micro-plastics occurs in the environment, air and water, affects aquatic life, animals and plants. Micro-plastics and PFAS damage plant structure and photosynthesis.

Health

Health and the environment are inextricably interlinked. The health and well-being of the community, the pristine environment and ecosystems on which life depends need full protection. Australia's wildlife is in serious decline due to habitat loss, invasive species and loss of habitat.

The most fundamental principles of good planning are health, and the community. Integral is the health and well-being of children today, and future generations. Children are extremely vulnerable to toxins, contaminants, pollutants and fume, including those found in plastic recycling, and in particular, children must be properly protected from harm.



Micro-plastics and plastic pollution are endemic, in the food and water we consume, in us. Micro-plastics have been found in 94% of oysters globally (Chemoshere Vol 307: Part 4: November 2022); in the gastrointestinal tracts of 62% of fish in Australia (Australian Marine Conservation Society, 2024).

Many chemicals and additives in plastics harm health, are carcinogenic; neurotoxic; cause respiratory disease including asthma; COPD; endocrine disruption; are associated with diabetes.

Humans ingest plastics through food, water and by inhalation of contaminated air. Plastic fume can cause severe irritation to eyes, nose, lungs, can be long term and irreversible. Conservative estimates show that humans ingest the equivalent of a credit card of micro-plastic per week. Plastics have been found in human placentas (Toxicological Sciences Journal, February, 2024).

While employed in Occupational Health some years ago, I witnessed workers in a plastic manufacture factory experiencing occupational asthma and skin irritation, despite the use of PPE.

There are numerous scholarly articles and journals to which the commissioners and IPC should refer regarding plastic and micro-plastic pollution with regards to the Plasrefine plan.

The ramifications of plastic on health are profound and deeply disturbing. Children are extremely vulnerable to and affected by harms from micro-plastics, fume, contamination of food, water and air. This community and the wider community deserve better. Disease prevention is better than cure.

Sustainable food supply and Food security for a sustainable city.

Peri urban agriculture provides a large proportion of perishable vegetables, fish, poultry, eggs, fruit, and mushrooms available in Sydney. This food supply is dependent on clean, arable soil, and clean water. Potential pollutants, toxins, micro-plastics, fume and run-off from the proposed Plasrefine facility could degrade or threaten this valuable local food supply.

Landuse and transport interaction:

The existing road system is totally inadequate for the predicted 100 heavy truck movements per day, as well as additional worker car journeys. Heavy truck movements will be disruptive, with increased vehicle accident risk from commercial traffic. The local road network would need to be substantially upgraded to carry heavy trucks with 100 movements per day. The proponents must be liable for these costs, on-going maintenance and repairs, not council or the community.

Fire risk

Fire risk is associated with plastic recycling. It has been reported that the local fire services are totally inadequate and under-resourced to control fire at the proposed facility. Modern plastics are highly inflammable, the combustion of which can generate thick acrid smoke that reduces visibility and hinders escape during fire emergency. There are obvious threats to workers, the community, nearby rural lands and bushland.

Plastics:

Throughout their life cycle from production to disposal, plastics release micro-plastics and nanoparticles that can affect human health. Plastics are manufactured from numerous chemicals, oils, gasses, synthetic additives. In time plastic materials break down to form micro-plastics, which permeate air, land and water. An estimated 145,000 tonnes of Australia's plastic leaks into the environment each year (Australian Marine Conservation Society, 2024).

Plastic recycling:

Recycling plastic is inefficient, expensive and hazardous, with little demand for recycled plastics (The Australia Institute, January, 2024). Recycling of plastics differs from paper, glass and metals waste streams with



established markets, because only a relatively low proportion of plastics are recyclable and/or are recycled, with relatively low market uptake of recycled product.

Recycling causes micro-plastics to be shed into the environment. Static electricity is generated by plastics and may cause harm. Additional chemicals and large volumes of water are required to re-process plastics. Even at its height of activity Redcycle collected less than 5% soft plastic.

Turkey is the largest recipient of plastic from Europe for recycling. Human Rights Watch (April, 2024) reported that workers and people living near the large plastic recycling facility have been exposed to harmful pollutants, odour and toxins emitted from plastic recycling, threatening their right to health. There are risks of developing significant lifelong health conditions including cancers and reproductive system harms.

In Adelaide, high levels of micro-plastic pollution have been found in wetlands on the edge of an industrial area, the source being plastic production factories and catchment run-off. These results are the largest found so far in the ongoing surveys by AUSMAP, the nation's largest data source on micro-plastic pollution (AUSMAP, Total Environment Centre, August 2024).

Policies and legislation

In Australia, government policies, action plans, covenants and legislation have been ineffective. There is urgent need for strong, effective plans, policies and legislation to phase out the use of plastics, including a plastics tax to begin to deal with the scale of the problem (The Australia Institute, 2024).

Summary

The only way to effectively reduce plastic pollution is to drastically reduce the production and consumption of plastics.

Wingecarribee Shire Council rigorous plans and LEP must be respected and upheld.

The health of the community, in particular, children, must be priority of all decision making, as well as the ecological processes, biodiversity, wildlife, and the well documented risks associated with the proposal. The Precautionary Principle (EP and A Act) must be applied in this instance.

There is convincing evidence and very clear rationale to refuse this plastic recycling proposal until safe, proven, evidence based solutions for plastic disposal and recycling can be found.

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References

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