



NAME REDACTED	OBJECT	Submission ID: 217155
Organisation: N/A	Key issues: Social impacts, Visual impacts, design and landscaping, Land use compatibility (surrounding land uses), Traffic, Other issues	
Location: Redacted		
Attachment: N/A		

Submission date: 11/22/2024 5:09:38 PM

Thank you for taking the time to read a further submission.

This development is not about wanting to save the planet or to do a good deed by removing plastic waste. It is all about profit. Not profit for our community, but to line the pockets of individuals who have no care for our community nor for our environment.

I want to point out that if we want to build whatever we want in the wrong location we would be rejected immediately. (development was rejected by Wingecarribee Council). It wouldn't matter if we thought the development had merit or would be of value to the community, or if we promised local jobs. Most of us who have built in Moss Vale provided local jobs too. We all use and contribute to our local businesses, use local builders etc. Our business owners provide local jobs. We have all done our best to build a wonderful, thriving community. We have been thoughtful, respectful of our environment and our neighbours. We are advised to fit in with the scope and scale of our neighbourhood. We follow this direction. This development does not fit with our neighbourhood at all. IT IS NOT THE RIGHT SITE FOR THIS DEVELOPMENT. We would be told the same thing if we wanted to build something so obviously unfit for its location. I am absolutely stunned that this proposed development was recommended for approval. There are too many reasons not to approve it. The Moss Vale and Southern Highlands community is hurting, we're frustrated, and we're confused that such a development would be recommended for approval at this location. This site is too close to homes. There is no buffer zone. I don't think GHD painted an accurate picture of this community, or this location and I don't think DPHI had a full understanding of the actual impacts this development will have on our community. By trying to solve one problem this development will cause many more problems and negatively impact the lives of so many people. The plastic products produced will be more toxic than the original form and won't be able to be recycled again. How are those products disposed of? It isn't a sensible solution to the problem. The experiment is not worth risking at this location.

The mitigation measures put in place will not adequately resolve the risks we face if this development goes ahead. The only way to mitigate these risks is to reject approval of this development. Zero chances should be taken with the health, wellbeing, safety and economy of our community. NO chances should be taken with the lives of our community. No chances should be taken with our environment, flora and fauna.

The mitigation measures are inadequate at best and, if approved, we can't be certain that the measures will be complied with over time. I can't see how anyone could be prepared to take that risk.

If this is approved, our community will end up having to become gate keepers to ensure the facility is run as per consent conditions. Will we be having to monitor truck movements entering and exiting the facility and monitor the times they are coming and going and what routes they are taking? Are we going to have to be trying to work out if the offensive odours coming from the facility are within and acceptable range. How will we know if the pollution coming out of the vents, or the stacks always meets emissions guidelines? How do we know if everything is in proper working order? If we do make a complaint, will it be taken seriously or how long will it take for the complaint to be actioned?

ZONING

I am concerned that the operation should not be placed in General Industry zoning, particularly one so close to residents, childcare, Garvan, sports fields, rural properties etc. If the land location was not so close to residents,



childcare, Garvan, sports fields and rural properties, more flexibility may have been OK. In this particular location, there should be no flexibility.

Plastics recycling should be in a heavy industry zone and considered a hazardous industry for the following reasons:

E4 General Industrial zones are the most common, accommodating for activities such manufacturing, processing, warehousing, storage and distribution and research and development and are designed for lighter industrial activities with less potential for adverse environmental impacts. You can find manufacturing, storage, warehousing and other light industrial operations in these zones.

E5 Heavy Industrial zones are intended for heavy and large-scale industrial activities with the potential for significant environmental impacts. Permissible land uses include heavy manufacturing, processing, recycling facilities, bulk storage and other intensive industrial operations.

Plastic recycling is a potential fire and pollution risk, therefore offers the potential for significant environmental impacts:

Generally, plastic recycling plants have the following risks:

FIRE RISK

- *Storage of plastic in bales, pellets or shredded form creates a high fuel load*
- *Shredding process can create combustible dust*
- *Melting and extrusion requires high temperatures which can cause fire*

With the addition of the storage of the flammable ingredients in Mr Lyu's patented cleaning formula is a huge fire risk and the land itself as is being in a designated bushfire prone area. Even the slightest risk of lithium batteries coming in with feedlot adds further burden to this risk.

POLLUTION RISK

- *Toxic chemicals: Recycled plastic pellets can contain harmful chemicals and the recycling process can contain new toxic chemicals.*
- *Volatile organic compounds (VOCs): Plastic recycling facilities emit VOCs into the air.*
- *Polycyclic aromatic hydrocarbons (PAHs): Plastic melting facilities emit PAHs into the air*
- *Wastewater from plastic recycling centres can contain toxic pollutants*

GHD REPRESENTATIVE SAID THAT THE SITE IS NOT BUSHFIRE PRONE.

This is not true, and I don't know what he is basing this statement on. If I was to buy a block of land in a designated bushfire area, the land would be known as bushfire prone.

You can verify this using the following link:

<https://www.rfs.nsw.gov.au/plan-and-prepare/building-in-a-bush-fire-area/planning-for-bush-fire-protection/bush-fire-prone-land/check-bfpl>

- *Accept terms and conditions*
- *Enter the property address 74-76 Beaconsfield Road, Moss Vale NSW, Australia*
- *Click get results*

The information provided shows:



The parcel of land you have selected is within a designated bush fire prone area

HOW LONG WILL THE DOORS BE OPEN IN A 24-HOUR PERIOD?

The GHD representative really blows the whole closed facility claim out of the window, even with the correction he made afterwards. The promise to shut down operations while doors are open is not realistic, nor is it viable when so many trucks are coming and going daily. The fine microplastic particles will be able to escape every single time the door opens and closes, whether there's wind or not. The truck itself will cause air to woosh in and out. There are no filters in place to stop this. The GHD representative was not at all convincing regarding this matter

I have also noticed there are 6 roller doors in that building. I've only ever heard them speaking about 1 roller door. This is shown in the assessment report on IPC website dated 10/10/24. Are they for a future increase of feedlot capacity? (more trucks, more risk). What is the purpose of those doors? I can't see where employees would be entering and leaving this building. Are they using the roller doors also?

If trucks are reversing into the building, there doesn't seem to be enough room for them to do so. I'm having trouble believing the times claimed for each truck to reverse into the building. It doesn't allow for any variables, errors or other timing mishaps. There also doesn't seem to be much room for large trucks to manoeuvre into the opening.

It is well known by locals that there's 8 train movements per day on the Boral line. Each time a train comes through there's up to a 15 min wait at the railway crossing. That's up to a 2 hour per day wait with Trucks and other traffic backed up. Any Plasrefine trucks waiting will all converge on the site together. How do they manage this? I can't see the doors closing at all during the day. I was also advised that a train broke down at the crossing on 16th November 2024. This resulted in a long line and traffic needing to turn back and choose another route or avoiding that route altogether. I'm assuming if this happens to Plasrefine drivers they will more than likely take another route to the facility, which goes against what we have been told by Plasrefine about truck routes. It would mean there will be a glut of trucks coming into the facility together. I doubt the door will be opened and closed between each waiting truck. I don't believe Plasrefine will have much, if any control over the actions of drivers and the route they take, particularly in situations where they are delayed.

TRAFFIC ON BERRIMA ROAD

The addition of so many extra heavy vehicles on Berrima Road will have devastating impact on the residents of New Berrima. This is the only route available to them to enter and leave their village. They need to drop their kids to school, go to work, pick up their kids, go shopping, go to sports, live their lives using this road. With the addition of all the extra heavy vehicles, Berrima Road is going to become like a major highway and will become extremely dangerous to these residents. The extra trucks will also add to the degradation of this road, which will cause more risk and huge expense.

GHD REPRESENTATIVES' RESPONSE TO THE LITHIUM BATTERIES QUESTION:

His response was not adequate. He is putting a lot of trust in the contractors to remove all other types of waste from the feedlot. There will be many contractors from different areas. Will each one of them guarantee that no lithium batteries will find their way into the feedlot? Some lithium batteries are tiny (e.g. hearing aid batteries), they could be hidden by labels on bottles or in whatever has been left in the bottle. No-one can assume that each and every contractor will be individually assessing every single item of plastic before it goes into feedlot or that every single person disposes of batteries in the recommended way, or even knows how they should be disposed of. It doesn't give me any confidence that batteries won't find their way into the facility, in fact it is a high probability, adding to the already extremely high fire risk at the facility.

GHD REPRESENTATIVES' RESPONSE TO AIR POLLUTION/MICROPLASTICS



The GHD representative was talking about all the microplastics already out there from other sources. He also mentioned that car/truck tyres are a big source. What about all the extra trucks coming into the area to and from Plasrefine? They would be another, preventable source of microplastic contamination. There should be NO microplastics or toxic pollution coming from this facility, any amount is unacceptable. There is absolutely no guarantee that their emissions won't exceed recommended amounts at all. It is impossible to guarantee, given the nature of the facility.

I know you've probably been provided with a lot of information about microplastics, but this is interesting and points out health impacts on local residents at another site. I'm sure these people were told they wouldn't have any negative health impacts as well.

https://ousar.lib.okayama-u.ac.jp/en/55203?fbclid=IwY2xjawGiJc1leHRuA2FlbQixMQABHTIOXFGA0MGblt-sQzg0SUJUXfAPwdURXZ1933ns-gxMn2U5JHsYUkRVTw_aem_kJxK3n_CF_Rckj0_8NkmEA

LOCAL EMPLOYMENT/BOOSTING OUR ECONOMY

There is nothing this company is offering to boost our already thriving local economy and community. The promise of a certain number of LOCAL jobs has, over time seems to have dwindled. I don't even know how many local jobs they are promising at this point. They admit themselves they won't need that many employees for a long time yet. We now know that industry specialists will be bought in from international sources. I would think that many, if not all the jobs will go to those outside of our LGA.

This facility will have a negative effect on our thriving local economy and current businesses including agriculture, wineries, tourism, our thriving equine industry, hospitality and small business.

Plasrefine will be draining our resources and our economy. Our local businesses, tourism, agriculture, wineries, equine industry and ABR will suffer. We will be left to cope with the roads needing repairs and upgrades, the consequences of a fire, the stress on the electrical grid and water resources etc. It is our community that is always ultimately going to have to pay for this. This is not the right location.

██████████ PATENTED CLEANING FORMULA is concerning and adds to fire risk:

I have provided the link to the patent to show full details. The following ingredients in this formula are all highly flammable and toxic to the environment.

<https://www.ipaustralia.gov.au/patents search for number 2019100134 in patent search>

How will these be stored? How will they be transported to the facility? In the case of a fire, all of these will cause or add to catastrophic events. All the mitigation measures in the world don't change what they are and how dangerous they are.

Turpentine

Flashpoint: Turpentine has a flashpoint below 100°F (38°C) and is considered a Class I flammable liquid.

Vapor: Turpentine vapours are heavier than air and can travel a distance to cause a fire or explosion.

Fire hazard: Turpentine is a severe fire hazard when exposed to heat, flame, or oxidizers.

Explosions: Containers of turpentine may explode in a fire.

Toxic fumes: When combusted, turpentine emits toxic fumes of carbon monoxide (CO).

Reactions: Turpentine reacts violently with chromic anhydride and can react exothermically with reducing agents to produce gaseous hydrogen.

Tea Tree oil



Tea tree oil is flammable:

Flash point

Tea tree oil has a flash point of 131°F (55°C).

Safety precautions

Keep tea tree oil away from heat, open flames, and sources of ignition. Do not smoke while using tea tree oil. Wear protective gloves, eye protection, and face protection.

Spill response

If tea tree oil spills, use sand or inert powder to absorb it immediately. Dispose of the spill according to local regulations.

Hazardous materials

Tea tree oil is classified as a dangerous good for all modes of transport. Do not transport tea tree oil with explosives, flammable gases, spontaneously combustibles, oxidizing agents, organic peroxides, toxics, or radioactive

Lemon mint oil is flammable. In fact, most essential oils are highly flammable, including lemon, peppermint, tea tree, clove, frankincense, and eucalyptus.

Here are some safety tips for handling essential oils:

Keep them away from open flames, candles, gas stoves, and lit cigarettes

Don't use heat to diffuse the oil's fragrance

Take extra precautions when disposing of them or cleaning up spills

Wear full protective clothing and a self-contained breathing apparatus in case of fire

Ethanol is highly flammable:

Flash point

Ethanol's flash point is around 14°C (57.2°F) at atmospheric pressure. This means that ethanol can catch fire when exposed to an ignition source, such as a spark, open flame, or hot surface, at or above this temperature.

Auto-ignition point

Ethanol vapor will spontaneously ignite in air at a temperature above 420°C.

Heavier than air

Ethanol vapours are heavier than air, so they spread along the ground and can travel considerable distances. This can lead to fires and explosions far from the source.

Smokeless blue flame

When ethanol burns, it produces a smokeless blue flame that may not be visible in normal light.

Ethanol is a toxic chemical that should be handled and treated as such.

RECOMMENDATION TO STAY INDOORS OR MINIMISE TIME OUTDOORS

To claim that in the event of extraordinary conditions that ABR will be the only receptor affected could not be accurate. In high winds, which happen often, or during another weather event or fire all residents close to the



facility and further away would be affected. The smoke will not go straight up in the event of a fire if there's any wind (which there generally is in Moss Vale). They can't guarantee this won't happen. Local knowledge is valuable, and people know if they will be affected by certain weather conditions. People saying that they will need to minimise their time outdoors was not misinterpreted. If the warning was given to ABR, the warning would need to apply to all residents within a certain proximity to the facility, depending on the wind speed and direction.

Moss Vale is a windy suburb and records high speed wind readings often.

In the GHD document, appendix j Air Quality and Odour (5. Particulate Matter Cumulative Impact Assessment), they state they have used data from Goulburn weather station. The data from Goulburn is not indicative of Moss Vale weather. It's not a case of close enough is good enough. Goulburn is at a different elevation and topography and approx. 70km away. Southern Highlands has varied microclimates. We have different rainfall, wind and temperatures than Goulburn. This is why many people who live in SH have their own weather stations. There is a weather station at Moss Vale, I don't know why they didn't use that for their data regarding Moss Vale weather. To make such an important assessment based on incorrect data is a waste of time and does not paint an accurate picture.

We often have fog in Moss Vale. When there is fog around the pollution coming from Plasrefine will be trapped until the fog lifts. We have extremes in weather, sometimes 4 seasons in a day. We get extremely low temperatures one day and higher temperatures the next day. Mornings can have heavy frost and fog and extremely low temperatures and the same afternoon it can be over 20degrees. We get gusty winds, and not just westerly winds. I have included a link to a website which shows historical data for Moss Vale.

As a result of climate change, extreme weather events have become more frequent and becoming more extreme. It's not a matter of these events happening rarely anymore. They are increasing in frequency, and this should be considered.

<https://www.willyweather.com.au/climate/weather-stations/nsw/southern-tablelands/moss-vale.html?superGraph=plots:wind-speed,wind-gust,grain:hourly,graphRange:5days&climateRecords=period:all-time&longTermGraph=plots:temperature,period:all-time,month:all&windRose=period:1-year,month:all-months>

REMOVAL OF EUCALYPTUS MACARTHURII TREES

These trees are listed as endangered. Please refer to the NSW Dept of Environment and Heritage website (link below). The original determination was made as vulnerable but superseded in 2014 by the endangered listing.

It looks like these trees are not even within the site boundary but sit outside the boundary. Who has given permission for these trees to be removed? Why is it OK to remove an endangered species when it's not even on the site or to remove them at all?

In the original statement by NSW Dept of Environment and Heritage, when the trees were listed as vulnerable it said that the current cohort of mature trees are unlikely to be replaced unless protective measures are implemented. How is removing them a protective measure?

<https://www2.environment.nsw.gov.au/topics/animals-and-plants/threatened-species/nsw-threatened-species-scientific-committee/determinations/final-determinations/2004-2007/eucalyptus-macarthurii-a-tree-vulnerable-species-listing>

LOOK AROUND THE SOUTHERN HIGHLANDS

The Southern Highlands is a well-known tourist destination. We have Food and Wine festivals, Tulip Time, Bong Bong Races, art galleries, beautiful gardens, restaurants, cafes, wineries. It has become a favoured wedding



destination, and many wealthy and famous people have chosen to live here in open spaces and a peaceful, clean environment. It is a place full of history and charm, of quaint villages, rural landscapes and many natural attractions. We have concerts at vineyards, markets, golf courses, antique shopping, farm gates, farm stays, horse riding, horse spelling and training, alpaca farms and many other things to see and do.

We had 4 runners in The Melbourne Cup from a local trainer (in Moss Vale) this year and a winner in 2022.

Our cold climate wines are extremely popular and attract many tourists to the area.

It is also home to a diverse range and age of people, who care passionately about their community and environment. We are proud of our area and what it has to offer.

Please don't allow this development to proceed in our beautiful area. Please don't jeopardise our peaceful, thriving community.

An interesting article below:

<https://www.afr.com/property/residential/the-rich-list-region-that-s-become-sydney-s-hamptons-20241113-p5kqfy>
