



NAME REDACTED

OBJECT

Submission ID: 218413

Organisation: N/A	Key issues: <i>Social impacts, Visual impacts, design and landscaping, Land use compatibility (surrounding land uses), Traffic</i>
Location: <i>New South Wales 2577</i>	
Attachment: <i>Attached overleaf</i>	

Submission date: 11/25/2024 3:59:18 PM

Please see attached submission

Moss Vale Plastic Recycling Facility, SSD-9409987.

To the Independent Planning Commission,

Thank you for the opportunity to provide my submission.

I am writing to provide a detailed objection to the recommendation by the DPHI for approval subject to conditions of the Moss Vale Plastic Recycling Facility, as outlined in the document submitted by GHD on behalf Plasrefine Recycling Pty Ltd and assessed by the DPHI. This submission highlights significant deficiencies in the assessment process and documentation, which necessitate a thorough reconsideration before any approval is granted.

Key Concerns

1. Inadequate Assessment Process

1.1 Compliance with NSW EP&A Act (1979)

The Department of Planning, Housing and Infrastructure's (DPHI) assessment under the Environmental Planning and Assessment Act 1979 (EP&A Act) is inadequate. Specifically, Section 4.15 requires a comprehensive evaluation of likely impacts, including environmental, social, and economic effects. The assessment fails to meet these requirements, particularly in terms of accurately representing the project's potential impacts.

1.2 Draft Consent Conditions

The proposed draft consent conditions appear to alter the development's impact profile to facilitate approval. Essential considerations have been deferred, which undermines the legal requirement for public exhibition and assessment prior to approval, particularly B39 and B44

2. Environmental Impact Statement (EIS) Deficiencies

2.1 Microplastic Pollution

The EIS lacks a detailed analysis of microplastic and nanoplastic pollution. Despite public and regulatory concerns, the applicant's response does not provide a meaningful quantitative assessment of risks associated with these pollutants. This omission limits the ability to evaluate environmental impacts thoroughly.

2.2 Wastewater Quality

The EIS fails to adequately assess wastewater quality and treatment effectiveness. The modelling presented focuses on discharge volume rather than quality, neglecting pollutants like microplastics and harmful chemicals such as PVC and PAHs. This oversight poses a risk to Sydney's drinking water catchment, and the DPHI fails to address this in conditions or the assessment document.

3. SEARs Compliance Issues

3.1 Baseline Data

The proposal does not comply with the Secretary's Environmental Assessment Requirements (SEARs), which mandate comprehensive baseline data on existing environmental conditions. The lack of detailed information on waste stream inputs further hinders a full assessment of environmental implications.

3.2 Feasibility Concerns

The proposal's reliance on modelled feedstock figures raises concerns about its commercial viability. The projected recycling capacity is based on assumptions rather than verified data, risking approval without thorough feasibility assessment.

Conclusion

The EIS and associated documents exhibit significant gaps in addressing critical environmental, health, and feasibility concerns. These deficiencies undermine the integrity of the environmental assessment process and raise serious doubts about the project's potential impacts on local ecosystems and human health.

The Assessment by the DPHI is flawed and the EIS is INVALID due to the SEARS not being addressed as required in the EP&A Act 1979

I urge the Independent Planning Commission to critically evaluate these issues before considering any approval for this development, in its current form this proposal warrants refusal.

Sincerely,