



NAME REDACTED

OBJECT

Submission ID: 218425

Organisation: N/A	Key issues: Social impacts, Traffic, Other issues
Location: Redacted	
Attachment: N/A	

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Submission to the NSW Independent Planning Commission

Re: Objection to the Proposed Plasrefine Plastic Recycling Plant at Moss Vale

Introduction

I submit this objection to the proposed Plasrefine plastic recycling plant at Moss Vale on the grounds of several critical issues related to human rights, environmental impact, traffic safety, air quality, and the proponent's lack of experience in plastic recycling. Specifically, the issues outlined below reflect concerns regarding the Human Rights (Healthy Environment) Amendment Bill 2023, the impact of increased heavy truck movements on local infrastructure, the potential degradation of air quality, the risk of water pollution affecting Greater Sydney's drinking water supply, and the proponent's admitted inexperience in plastic recycling.

1. Violation of the Human Right to a Healthy Environment

The Human Rights (Healthy Environment) Amendment Bill 2023 enshrines the right of all individuals to live in an environment that is conducive to their health and wellbeing. This Bill recognises that environmental degradation, such as air pollution and hazardous waste, can directly affect people's rights to life, health, and wellbeing. It also obligates the government to ensure that new projects align with these rights.

The Plasrefine plant, which will process significant amounts of plastic waste, may inadvertently undermine this right. While its core aim is to recycle plastic, the environmental impacts of its operations—including emissions from machinery, potential contamination of local ecosystems, and harmful pollutants released into the air—could harm the health of the local community in Moss Vale. The potential release of particulate matter, volatile organic compounds (VOCs), and other hazardous emissions could lead to respiratory issues, cardiovascular problems, and other health risks for residents, particularly vulnerable groups such as children, the elderly, and those with pre-existing health conditions.

Further, the potential contamination of nearby water sources or soil from the plant's operations could compromise the environment, making it difficult to maintain a healthy standard of living for local residents. Of particular concern is the potential pollution of the Wingecarribee Reservoir, which is a key water source for Greater Sydney's drinking water supply. Any contamination of this critical resource could have far-reaching consequences for public health across a much larger population.

2. Traffic Impacts and Safety Concerns

The proposed plant would require heavy truck movements for the transportation of plastic waste into the facility and the removal of processed materials. Moss Vale, a relatively small town, is not equipped to handle the large volume of heavy vehicles that would be needed to service this plant. The introduction of such traffic would create significant safety hazards for pedestrians, cyclists, and other road users, particularly on roads not designed for heavy industrial traffic.

The increased truck movements would exacerbate the existing traffic congestion, causing delays and disruptions, and potentially resulting in accidents. Local roads could deteriorate quickly due to the additional wear and tear from constant heavy truck use. This would place an undue strain on the local infrastructure and



significantly reduce the quality of life for residents who would be subjected to noise, dust, and increased road traffic.

Moreover, the safety risks are compounded by the close proximity of the plant to residential areas, schools, and recreational spaces. The hazards of truck collisions, spills, or accidents involving hazardous materials would pose a direct threat to public safety.

3. Impact on Air Quality and Public Health

The operation of the plastic recycling plant could have severe negative consequences for local air quality. Processing plastic involves heating, melting, and refining materials, all of which can release harmful emissions such as carbon monoxide, dioxins, and particulate matter into the air. The risk of particulate pollution and chemical emissions is particularly concerning in a rural area like Moss Vale, where air quality is typically better than in urban centres.

An additional concern is the potential release of microplastics into the atmosphere during the recycling process. Microplastics are increasingly recognised as a health hazard; however, there are currently no clear guidelines or standards for acceptable levels of exposure to airborne microplastics. This lack of regulation adds significant uncertainty regarding the plant's potential impact on public health. In particular, the long-term health effects of inhaling microplastics remain poorly understood, posing a substantial risk to the local community.

Plasrefine, the proponent of the facility, has reportedly stated that "you can manage exposure to air pollutants by limiting time outdoors." Such a suggestion is not only inadequate but also dismissive of the fundamental right to clean air and the community's ability to live freely in their environment. Asking residents to restrict their outdoor activities to mitigate the impact of air pollution shifts the burden of responsibility from the proponent to the community, which is neither fair nor consistent with public health principles.

The implications for public health are substantial. The release of these contaminants would contribute to respiratory and cardiovascular issues, particularly for those already vulnerable to air pollution, such as children, the elderly, and individuals with pre-existing health conditions like asthma. As air pollution levels rise, the overall health of the community could deteriorate, which directly contradicts the principles outlined in the Human Rights (Healthy Environment) Amendment Bill 2023.

4. Proponent's Lack of Experience in Plastic Recycling

The proponent of this facility, Plasrefine Recycling Pty Ltd, was registered in Australia in 2020 specifically for this proposal. By the director's own admission, they have no experience in plastic recycling, nor does the Chief Technical Operator noted in the scope. This lack of experience raises significant concerns about the proponent's capacity to manage the complex processes involved in plastic recycling safely and effectively. The absence of a proven track record in this industry heightens the risk of operational failures, environmental mishaps, and non-compliance with regulatory standards, all of which could have severe consequences for the local community and environment.

5. Recommendation for Alternative Locations

Given the concerns outlined above, it would be more appropriate to consider an alternative location for the plant that is better suited to handle the industrial scale of the operation. Locations such as Muswellbrook or Port Kembla may be more suitable due to their established industrial infrastructure, better road networks for heavy truck transport, and proximity to larger urban centres with a lower concentration of residential areas. These locations would reduce the potential impact on smaller rural communities like Moss Vale, providing a safer, more efficient setting for a facility of this scale.

Muswellbrook, for example, has experience in accommodating heavy industry and infrastructure that would be capable of supporting large-scale operations like a plastic recycling plant. Similarly, Port Kembla offers a robust



industrial environment with access to major transport routes, port facilities, and a highly skilled workforce, making it a more logical choice for such a facility.

Conclusion

For the reasons outlined above, I strongly urge the NSW Independent Planning Commission to reject the proposed Plasrefine plastic recycling plant at Moss Vale. The plant would violate the human right to a healthy environment, pose significant traffic and safety risks, degrade local air quality, potentially contaminate the Wingecarribee Reservoir"jeopardising Greater Sydney™s drinking water supply"and is proposed by a proponent lacking experience in plastic recycling.

I respectfully request that you consider the possibility of locating the plant in a more suitable area, such as Muswellbrook or Port Kembla, where the plant™s scale, transportation needs, and environmental impacts can be better managed, and where the local community™s health and wellbeing are not jeopardised.

Sincerely,

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