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OBJECT

Submission ID: 218518

Organisation: <i>N/A</i>	Key issues: <i>Traffic, Other issues</i>
Location: <i>New South Wales 2577</i>	
Attachment: <i>Attached overleaf</i>	

Submission date: 11/25/2024 4:51:32 PM

See attachment

Application Number: SSD-9409987
Applicant: Plasrefine Recycling Pty Ltd
Consent Authority: Independent Planning Commission
Site: Part Lot 11 DP1084421, 74-76 Beaconsfield Road, Moss Vale
Development: Construction and operation of a plastics recycling and reprocessing facility with the capacity to process up to 120,000 tonnes of mixed waste plastic per annum

I oppose the proposed development at its current location and in its current form and the Independent Planning Commission should not grant consent.

There are unanswered questions in relation to possible long term health impacts for local residents and the wider population in the Sydney area that rely on drinking water from the catchment. Other concerns relate to the adequacy of the air quality studies; underestimation of population/traffic growth; the lack of relevant skills or experience of proponent's senior management; whether the compliance arrangements are realistic and can be adequately monitored.

Long term health issues (Residents of Moss Vale and Sydney) - PFAS

Concerns regarding emerging contaminants such as perfluoroalkyl and polyfluoroalkyl substances i.e. PFAS (inc PFOA; PFOS; PFHxS; PFNA; HFPO-DA) have not been adequately considered. This is an emerging issue worldwide with a range of views about what constitutes a safe level of exposure to various PFAS compounds.

I note that Wingecarribee Shire Council has conducted testing to ensure the safety and quality of the drinking water supplied to the community, and the Council reported that *"laboratory analysis of raw and treated water samples from Wingecarribee and Bundanoon Water Treatment Plants returned 'nil detectable' results for PFAS"*.

Sydney Water advise *"We regularly test the drinking water produced by our water filtration plants for perfluoroalkyl and polyfluoroalkyl substances (PFAS) and publish the latest results. We can reassure you that PFAS levels in all treated water samples we've tested are well below the values specified in the [current] Australian Drinking Water Guidelines."*

Also, WaterNSW state that *"Potential health risks from PFAS relate to drinking water over a lifetime, as it accumulates in trace amounts in the body over a long period from numerous sources. **PFAS generally does not pose short/medium term health risks.**"* By implication this suggests there may be health risks in the long term.

The Australian Drinking Water Guidelines recommended levels of PFAS in drinking water are currently under review. The National Health and Medical Research Centre (NHMRC) released proposed updated guidelines in October 2024 which outline new, lower recommended values of PFAS in drinking water.

The US Environmental Protection Agency considers there is no safe level of PFAS in drinking water, due to health risks it presents to humans, but the Australian government guidelines currently state there is a safe level of exposure.

In the United States the EPA recently set mandatory enforceable levels for 6 PFAS in drinking water and also recommended health-based (non-enforceable) levels for 2 PFAS (PFOA & PFOS) of zero. *"EPA expects that over many years the final rule will prevent PFAS exposure in drinking water for approximately 100 million people, prevent thousands of deaths, and reduce tens of thousands of serious PFAS-attributable illnesses."*

There are already indicators that PFAS may be more prevalent in the Wingecarribee area than first thought. Scientists from Western Sydney University (WSU) have discovered PFOS in the livers of eight deceased platypuses collected from numerous NSW rivers. Testing of a platypus from the Wingecarribee River at Berrima, at the top of Sydney's drinking water catchment, showed a PFOS liver concentration of 390 µg/kg.

The study said there were currently no concentrations considered safe for platypus health, *"however, draft guidelines by the Australian government suggest that exposure directly from their diet should not exceed 3.1 µg/kg of wet weight."*

This suggests these chemicals may be far more prevalent than previously understood, and given the approach taken by the EPA in the US, a cautious approach to projects that may involve PFAS/PFOS chemicals is essential. The potential risks associated with PFAS exposure are very concerning especially in a drinking water catchment area, adjacent to a riparian corridor and residential development, as is the case with this proposal.

The proponent has not provided adequate information regarding the management of PFAS at the facility and in residues/discharges from the facility, including process waste sent to landfill, gases and wastewater discharges, sludge or filter cake residue sent to landfill, and given these chemicals are colloquially called "forever" chemicals for good reason, it is critical that consent not be granted while these concerns remain unanswered.

Air quality studies – missing information

The air quality studies don't appear to have addressed atmospheric stability issues, including the frequency and duration of temperature inversions. Given the plant will operate 24/7 there may be occasions (e.g. early mornings with low wind) when temperature inversions will trap gaseous emissions and odours. In these circumstances the ground level concentrations/impact could be higher.

Underestimation of traffic growth

The projection of 2% growth for current traffic flows seems low given the significant residential and commercial developments that are already being built (e.g. Ashbourne Estate) or awaiting approval.

The lack of relevant skills or experience of proponent's senior management

It is concerning that the senior management of the company proposing this development appears to have very limited experience or skills in the business of plastics refining. Given the complexity and size of this proposal this could present a significant risk. Also given this will effectively be a monopoly business, there will be a tension between enforcing compliance and 'keeping the plastic refining going' to reduce the current stockpiles.

Whether the compliance arrangements are realistic and can be adequately monitored

I note that the local council are concerned about the compliance burden this project will impose if given consent as current recommended. As a ratepayer to the local council, I am concerned if the consequence of this proposal going ahead is higher rates to cover additional compliance management as well as infrastructure upgrades/maintenance.