



**SAM SEVIERI**

**OBJECT**

Submission ID: 217652

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

Submission date: 11/24/2024 1:19:58 PM

*I realise this may be outside the remit of the IPC, but believe it is worth pointing out given the NSW Premier's recent advice to our community to 'trust the process'. The SSD EIS process is fundamentally flawed and does not provide the community with equal opportunity to review and comment on proposals as are afforded to the proponents:*

- Request for SEARs for this proposal was lodged by GHD in September 2020*
- SEARs and DPE/DPHI cover letter issued October 2020*
- EIS Report prepared by GHD/proponent, dated January 2022 [15 months from SEARs to EIS]*
- Notice of exhibition of SSD Application and public exhibition 23/02/2022 to 22/03 2022 on department's website and a hard copy at Council. No other attempt made to consult or raise awareness with community*
- Community given 27 days to review and respond to hundreds of pages of technical information--despite this over 300 objections lodged*
- DPE/DPHI letter to proponent 24/03/2022 noting close of exhibition of EIS and requesting written response to submissions*
- DPE/DPHI letter to proponent 14/04/2022 noting department's request for a response to submissions and stating DPE has completed its review of EIS and asking for a response to submissions and identified in previous correspondence, gives no deadline*
- GHD/proponent response to submissions report provided to DPE 10/03/2023*
- DPE/DPHI letter to proponent dated 17/03/2023 requesting further information around haulage routes along Innes Road, requests response by 14/04/2023*
- GHD/proponent letter to DPE dated 28/09/2023 with formal amendment to SSD and Amendment Report*
- DPE letter to Plasrefine dated 29/09/2023 advising approval of application for amendment*
- Notice of exhibition of amended SSD application (undated) with public exhibition 05/10/2023 to 01/11/2023 [community has 28 days]*
- Letter from DPE to Plasrefine dated 10/11/23 referring to Department's request for Response to Submissions Report [dated 02/22/23] noting it has finalised review of Amended Development Report provided and asking GHD/Plasrefine to include in the RtS a response to the issues raised in Attachment 1 and noting that advice from Boral, NSW Health and DPIE Water still outstanding*
- GHD Preliminary Design Report 22/04/24 submitted along with covering letter GHD dated 23/04/24 titled '~Response to Requests for Additional Information from February to March 2024'*
- GHD Response Appendix A, Amended proposal site drawing, Appendix D Updated Design, Appendix E Updated facility layout dated 30/04/24 (just on portal, nothing else)*
- DPHI SSD Assessment Report dated October 2024 recommending approval*



- DPHI letter of referral to IPC from David Gainsford dated 10/10/24

- Speaker registrations open 11/10/24 and submissions close 25/11/24 [community 31 days]

*By my reckoning, the community has had a total of 86 days (including IPC process) to review, digest, evaluate and assess thousands of pages of complex technical and assessment documents. The proponent and GHD have had ~1,200 days out of a total of ~1,226 days to 'develop' their proposal. This is hardly an equitable process. Notwithstanding, it has been the responsibility of the community to conduct the due diligence necessary and to identify missing information from the EIS documents. The documentation and required standard of due diligence has been lacking at every stage of this SSD/EIS process. The community has been responsible for holding proponent and department to account. We have become the de-facto assessors and schooled ourselves in matters as far ranging as fire hazards, riparian zones, water catchments, traffic and haulage routes, microplastics and emissions safety, land use and planning, and strategic infrastructure needs. Despite the manifest disadvantage of only being privy to crucial information at permitted (three) points in the assessment process, it has been our responsibility for ensuring that the basic values of transparency, accountability and public interest have been met. Finally, I would say that from the start to the end of the EIS process, members of our community have called or emailed the department repeatedly asking--begging--for information about the processes that were being followed to assess the proposal. Just the process, not the assessment. Almost every approach was ignored. When not ignored, we were given only basic or vague information about the SSD assessment process, nothing really beyond the high-level milestones noted on the department's planning portal.*

*Now tell us to trust the process, Premier.*

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