



WAYNE PRATT

OBJECT

Submission ID: 218498

Organisation: <i>N/A</i>	Key issues: <i>Social impacts</i>
Location: <i>New South Wales 2576</i>	
Attachment: <i>Attached overleaf</i>	

Submission date: 11/25/2024 4:43:32 PM

submission attached

Moss Vale Plastics Recycling Facility

State Significant Development Assessment Report (SSD-9409987)

OBJECTION

I write to formally object to approval of the above Application. I have previously been an Applicant for State Significant Developments and therefore have awareness of the degree of detail and precision that is ordinarily required by the Department for such projects. Having worked on all aspects of plastic and polystyrene recycling business for over 6 years (capital raising, design and commission, construction, operational management) I am astonished, actually and genuinely shocked, at the lack of vital detail, the obvious mistakes, the glaring failures in the Applicants' submissions, the failures of consulting Departments and the abject failure of the Independent Planning Commission to make themselves aware of these issues.

The fact that the IPC is willingly partaking in and, in deed, promoting a process where the Applicant gets to reply *ad hoc* to each objection, often on a daily basis as new objections are raised, is NOT a rectification of process and assessment failures and is, at the least, a swingeing indictment of competence and, in all likelihood, raises fundamental issues of probity of this process.

To summarise just a few of the obvious issues:

- the Applicant's recent submission of 400grams per day of micro-plastic release is an abject scientific absurdity. It cherry-picks one data point from a 2016 study, since discredited in peer review, that only makes reference to micro-plastics and ignores nano-plastics. However it is nano-plastics which are now understood by the scientific community to be the primary cause of human health concern due to the ease with which they penetrate ALL organs and even individual cells. The use of this figure raises a distinct dilemma for the Applicant AND for the Commission: anyone wishing to stand by this figure is going to be revealed to be either disingenuous or incompetent.
- Studies from 2021, 2022, 2023 and 2024 all put the effectiveness of DAF waste water processes in a range of 30%-40%, not the 90% selected by the Applicant.
- Studies from 2024 show that waste-water sludge containing micro-plastics largely destroys any claims to 'circular economy or 'closed loop' benefits and that the processes involved can increase the toxicity of micro-plastics in these sludges and have raised strident calls that waste-water sludge no longer be used as fertiliser or be allowed into general waste dumping, as the Applicant proposes.
- Air-quality studies increasingly show that:
 - a) current filtration technology is largely ineffective to the point of uselessness in preventing the escape of nano-plastics
 - b) working in such a facility significantly increases risk of heart attack, stroke and a range of cancers, and
 - c) the scientific community is even struggling to come up with effective monitoring / measurement methods because of the difficulty of point a) - what you can catch you can't measure
- This Application carries with it a very high probability of taking out - not impacting but REMOVING - Sydney's Western water supply (Burragorang) but also its' Eastern supply (Avon, Nepean and Cataract Reservoirs). The logic is simple: we know that plastics facilities burn with great ease and with great regularity. We know that they burn at speed - the nearby Hume Plastics Fire in 2022 took 11 minutes to be defined as 'unstoppable' by the responding fire services. This, on a plant less than 1/6th the size of

this Proposal, with 7 fire units on-site in less than 20 minutes. Plasrefine will have 1 unit available. We know that the smoke plume is NOT vertical from these fires: just google 'plastic plant fire' images to see what actually happens. We know that water run-off from such a fire WILL enter the Wingecarribee, taking out Burragorang/Warragamba. We know that the average wind conditions to this windy region will blow the smoke over Nepean and Avon catchments in half an hour. We know that, once contaminated, we cannot un-contaminate these water sources. The Commission actively risk given the State Government and the people of Sydney an unrecoverable disaster.

- Any group proposing a recycling facility would be expected to know, with certainty and from the outset, not just what processes it intends to use, but exactly which pieces of equipment, right down to model numbers, will be used throughout. Without this level of detail there is NO way to make any claims about control of emissions other than a blanket concession that the site will leak contaminants in all directions.
- The health impacts of micro-plastics are NOT an emergent issue: the scientific literature of peer-reviewed articles in this area is past 8,000 for this calendar year so far. We know that the impact of micro-plastics will be at least as significant as asbestosis. There, without doubt, be both a wide-spread health impact and a massive legal liability impact.
- If the Commission does not already understand each of these vital points it - at a minimum - should use the Precautionary Principle and call for genuine independent modelling across each of these issues as it is entirely entitled to do. Subjugating any of these to a post-approval 'Approval Conditions' phase will be found so significantly wanting that government will find it likely impossible to avoid the emergence of a strict liability issue of massive magnitude.

With so many glaring issues associated with this Application, with little to no business case (recycled plastic is more expensive than virgin plastic), with a proposed manufacturing purpose in Building 2 that clearly contravenes the permitted zoning, with no Fire Report in accordance with the post-2019 Bushfire requirements, with better situated alternate sites in the region and in the Illawarra having been put in front of the Applicant, with local, State and Federal elected Representatives formally and publicly opposed "Who coulda knowed?" simply cannot be used as a defence of the indefensible.