



HEATHER CHAMPION

OBJECT

Submission ID: 218532

Organisation: N/A	Key issues: <i>Land use compatibility (surrounding land uses), Other issues</i>
Location: New South Wales 2575	
Attachment: N/A	

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Submission to the NSW Independent Planning Commission

Objection to the Moss Vale Plastics Recycling Facility, æPlasrefine, SSD-9409987

Cr Heather Champion, Wingecarribee Shire Councillor

*Note 1: This submission reflects the views of the author and aligns with the position taken by the Southern Highlands Greens. It does not seek to present the position of Wingecarribee Shire Council.*

*Note 2: Wingecarribee Shire lies on unceded Gundungurra Country. I acknowledge the traditional custodians of this place, who have cared for its land, waterways and skies since deep time, and pay my respects to Elders, past and present.*

*I submit this objection to the proposed Moss Vale Plastics Recycling Facility (known as 'Plasrefine') wearing several hats: as a resident and member of the Southern Highlands Community, as a parent concerned for the future health and safety of this region, as a member of the Southern Highlands Greens, and as a Councillor who feels compelled to amplify the voices of the many, many locals who object to this proposed development on grounds of environmental protection, safety, and health.*

*>In favour of plastics recycling, but not this proposal*

*We have a collective responsibility to protect our water, air and environment for our children™s future. As NSW faces a waste disposal crisis, it is essential that we reduce the production of waste products like plastics and conduct careful, consultative and sensitive planning for recycling processes to deal with the existing problem. In fast-tracking our transition to the circular economy, we must establish appropriate locations for recycling infrastructure in a way that involves communities in planning and does not pose risks to human and environmental health.*

*The present proposal is not consistent with that path to a sustainable future.*

*>Not the Right Site*

*There is a reason that plastics recycling facilities are usually located in heavy industrial zones. These facilities are notoriously hazardous, prone to frequent fires initiated by lithium-batteries and producing fires with extremely high temperatures/fire loads that are difficult to manage. Evidence suggests that even state-of-the-art recycling facilities also leak microplastics and nanoplastics into wastewater and air, and this risk multiplies when there are machinery malfunctions.*

*Safely located facilities are established with buffer zones around them and infrastructure to support industrial activities. Albury™s recently established facility, for example, is located an 10km from the CBD and 7km from residences.*

*The proposed site in Moss Vale represents a significant failure. Sitting within 200m of residential homes, with schools and childcare in a 2km radius and the Garvan institute only 50m away, the resulting threat to life and property in case of malfunction or fire is extreme and inappropriate.*



>Fire risk

*The Environmental Impact Statement (EIS) fails to adequately assess the serious risk of fire and supporting documentation fails to lay out mitigation strategies. Given the proximity to residences and research facilities, the implications for this oversight are potentially catastrophic.*

*Plastics recycling facilities are prone to frequent fires initiated by lithium-batteries and producing fires extremely high temperatures/fire loads. In this case, the size of the facility would magnify the size of the fire. The Plasrefine application identifies that the facility will hold ca 20,000t of unprocessed plastic onsite at any one time, plus an undisclosed volume of processed plastic product, and an undisclosed quantity of unidentified chemicals to be used in processing. The Canberra plastics recycling fire in Hume on 24 Dec 2022, for comparison, was fuelled by only 150t of material, which was destroyed by fire in under an hour.*

*Internal risk of fire are matched by under-recognised bushfire risks. It is of significant concern that the proponent has relied on bushfire mapping that has not been updated since 2011 and indicates that this site is not bushfire prone. Since then the site has been designated bushfire prone. It is worth noting that there has been a significant increase in natural disasters in the area, including significant fire impacts in 2019-20, and in the last 5 years Wingecarribee Shire has recorded 15 natural disasters, meaning it now has the highest rate of disaster of any LGA in NSW.*

*Despite this, fire risk assessments have not been completed for this proposal, a bushfire risk assessment has not been completed, the DPHI categorises fire risk as a relatively minor concern, and the NSW RFS has not been consulted.*

*Local fire response capacity is simply insufficient to respond, and relying on support from Narellan and Albion Park (45-50m away) is utterly inadequate to protect homes and community from fire risk.*

>Microplastics: health risks

*Micro and nanoplastics are already ubiquitous in our environment, and have been found in human blood, breast milk, and the faeces of babies and adults. Studies indicated that increased exposure may have serious health impacts, and the proximity of the facility to waterways, homes and schools means the facility poses an extremely high risk of air, water and soil microplastic contamination in the event of filtration equipment malfunction, fire, or natural disaster.*

*Plastics recycling is a significant source of microplastic pollution, with Australian researchers estimating that between 620,000-3,200,000 tonnes of microplastics may have been unintentionally generated by recycling globally.*

*Thalidomide, nicotine, asbestos and silica were all considered safe for exposure until we established that they were not. Microplastics may prove to be the same. Given the mostly unknown health impacts of exposure to microplastics, the IPC should adopt the precautionary principle and act to prevent unnecessary exposure by refusing this facility in its current location.*

>Impacts on safe water supply

*The proposed site is only 10 metres from riparian waterways that feed directly into Warragamba Dam, Sydney's primary drinking water catchment. The possibility of introducing microplastics (and other chemicals involved in the recycling process) into Sydney's drinking water is appalling. Wastewater will also pump directly into the Wollondilly river and then into local drinking water. The EIS provides no reassurance of how wastewater will be managed, or the baseline level of microplastics in local wastewater.*

>Microplastics: inadequate EIS

*This in turn raises the question of whether the environment impact statement is or is not legally compliant. The EIS does not provide a clear baseline assessment of the aerial, terrestrial, aquatic or sewer levels of*



*microplastics, and there is no assessment of the human-health or environmental risks of microplastics, including how microplastics combine with other pollutants to magnify those impacts.*

*The proposal also fails to identify the plastics cleaning technologies or the planned discharge limits for the emission of microplastics. These questions have been deferred to after construction, leaving the community and the IPC with questions but no answers on which to base their assessment of safety.*

*>Planning issues*

*The location is part of the current SHIP Masterplan, designed to provide guidance on appropriate development on the location.. The proposal is inconsistent with several key elements of the draft Masterplan and will sterilise the land for use as planned by the Council and community in this masterplan.*

*>Lack of consultation*

*Importantly, it appears that Traditional Owners have not been formally consulted. Gundungurra Elder Aunty Sharyn Halls has publicly opposed the proposal, pointing to the damage it will do to waterways, saying: "All our riparian areas, all our waterways are sacred. ' By putting a factory where they are putting it, our cultural values are lessened." This undermines the principles of respect and inclusion stated in our state planning framework.*

*Consultation with the broader community has dismissed the many concerns raised by residents. The process has failed to secure social license, and opposition has grown substantially and become entrenched as more residents have become aware of the proposal. As a result, objections, appeals and delays are likely to continue, undermining the potential for this facility to function as intended.*

*>Precedent for refusal*

*The Hume Coal proposal, located a short distance from this site, was refused by the IPC partly due to unacceptable risks to groundwater and Sydney™s drinking water catchment. The overlap with the Plasrefine proposal is apparent. Other reasons for refusal included incompatibility with local land uses, including agriculture, tourism, and residential areas, all of which will also be raised in other submissions as reasons to refuse Plasrefine. The IPC will find that the Plasrefine proposal similarly conflicts with the character and aspirations of Moss Vale, which focuses on sustainable rural industries and community well-being.*

*On the basis of serious risks to the health, safety and wellbeing of the people and environment of the Wingecarribee Shire, I urge the IPC to refuse consent for this proposal.*

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