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OBJECT

Submission ID: 218442

Organisation: N/A	Key issues: <i>Social impacts, Land use compatibility (surrounding land uses), Other issues</i>
Location: New South Wales 2103	
Attachment: N/A	

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Dear Commissioners,

I am writing to express my strong opposition to application SSD-9409987. The proposed development presents unacceptable risks to Sydney's drinking water and to the health of the Southern Highlands community.

I am the NSW Member of Parliament for the seat of Pittwater located on Sydney's Northern Beaches. I have had many representations made to me by my local constituents who are very concerned about the potential contamination of Sydney's drinking water " particularly from nanoplastics, microplastics and forever chemicals (PFAS).

Australia's current regulatory framework falls short of protecting the population from the risk of health impacts from these pollutants, particularly when compared to other jurisdictions. Additionally, our wastewater and water treatment facilities do not have the ability to adequately remove these pollutants from the water.

I have been a long-term advocate for Australia to reduce its use and dependence on plastic and better manage its waste. I also support regulation to end externalising our plastic waste by exporting to developing countries which leads to abhorrent mismanagement. However, we must accept that plastic recycling is problematic, results in lower quality, more toxic secondary plastic and creates environmental waste in the process.

We must not swap one problem for another in our efforts to build a robust circular economy. We must ensure that recycling facilities do not pose a risk to our environment, water and human health. A primary consideration for any facility is its location and what is co-located around it. In this case the location is not appropriate " as there are thriving communities, childcare facilities and even the Garvin Institute (a scientific institute worried about the health impacts to its mice). We also have the broader Sydney community at risk due to this facility's location near a water catchment.

Every effort must be made to prevent a facility in this location which could lead to human health issues. This proposed facility risks Sydney's water catchment as well as airborne microplastics on a more local level. In the event of a fire, the toxicity impacts to the local community could be catastrophic. In short, this facility's location is completely inappropriate and must be rejected.

Plastics recycling as a source of microplastic pollution

If approved, this recycling facility proposes to process 120,000 tonnes of plastic a year. 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.

I am very concerned about the health implications of microplastics. The Minderoo-Monaco Commission on Plastics and Human Health has highlighted that œplastic production workers are at increased risk of leukemia, lymphoma, hepatic angiosarcoma, brain cancer, breast cancer, mesothelioma, neurotoxic injury, and decreased fertility. Plastic recycling workers have increased rates of cardiovascular disease, toxic metal poisoning, neuropathy, and lung cancer.

The location of the PlasRefine facility is so close to the community that these health impacts may be of risk to the local community and broader Sydney community should microplastics enter the water system.



The science is clear that plastic recycling contributes significant quantities of microplastics to the surrounding environment, even when best practice mitigation measures are adopted. Several studies, including in Australia, China, South Korea, Vietnam and Norway, have similarly found that plastics recycling facilities are a significant source of microplastics pollution.

I note that the Wingecarribee Local Council objects to the PlasRefine development, stating that the proposal has neither strategic nor site specific merit. and states that the Moss Vale Sewage Treatment Plant has no specific element capable of removing microplastics. The Council further notes that the development has yet to have a full assessment of the potential impact of microplastics on human health, on local agriculture, including livestock, crops, and feed supplies, on food chains, on nearby land uses, on water catchments and water courses on ecology and the local economy.

The proponent's estimated wastewater emissions are at odds with various scientific studies that indicate significantly higher levels of microplastic emissions from plastics recycling facilities. Specifically, proponents of this development expect to discharge up to 400g/day of microplastics to the Moss Vale Sewage Treatment Plant. This will inevitably result in an increase in microplastics making their way into the environment in treated effluent which is wholly within the Sydney Water Drinking Catchment, potentially affecting the drinking water of millions of residents in the greater Sydney area.

Inconsistency with current planning laws

I echo the concerns of other submissions to this proposal around the proposed land use, which have not been correctly outlined or defined in the application documents or the assessment report prepared by the Department of Planning, Housing and Infrastructure.

Specifically, the Environmental Impact Statement (EIS) and Assessment Report prepared by the Department of Planning, Housing and Infrastructure (DPHI) define the proposed facility as a resource recovery facility. However, the use and operation of one of the buildings "specifically Building 2 which will reprocess recovered plastic into new plastic products" is inconsistent with the definition of a resource recovery facility. The use and operation of Building 2 is more appropriately defined as industrial activity, as it includes the manufacturing, production and processing of recycled plastic into new plastic products for commercial purposes. The use and operation of Building 2 is more appropriately defined as industrial activity, being either heavy industry or general industry. Heavy industry is prohibited in the E4 General Industrial zone.

Along with others making submissions on this proposed development, I believe that the EIS must be re-exhibited with the correct designation of Building 2 as being for industrial activity. It is critical the public be made aware of this distinction. Should the operation and use of Building 2 be classified as heavy industry, the proposal should then be refused accordingly.

Fire risk

The 2022 fire at the Hume recycling plant in Canberra is a clear reminder of the dangers posed by recycling facilities. In this case, the nearest houses were over 1.8km away " nine times further than the closest resident less than 200m away from the PlasRefine site in Moss Vale. Yet the impact on the surrounding area was nevertheless significant. This occurred in an industrial area, with city-level firefighting resources, where 18 crews were mobilised within eight minutes of the 000 emergency call. However, the fire still could not be contained.

By comparison, the proposed PlasRefine facility has the capacity to store up to 20,000 tonnes (over 100 times as much as the Hume facility) in a region with no permanently-manned fire stations. The nearest permanently-manned stations are at Narellan (46 minutes away) and Albion Park (49 minutes away). The 2022 Hume fire demonstrates the inherent risks of placing hazardous industrial activities near residential areas and drinking



catchments, particularly where firefighting resources are lacking, as is the case in Moss Vale. More worryingly, the current address for the proposed facility is classified by the NSW Rural Fire Service as within a designated bush fire prone area. Put together, these factors around fire risk show why the proposed site for this facility is wholly inappropriate.

This proposal should be rejected as it is in an inappropriate location. Crucially, it should be appropriately distanced from communities and from waterways leading to drinking catchments. The nearest resident is less than 200m away, the nearest early childhood centre is 750m away and the site is located in a flood-impacted area adjacent to a riparian corridor that runs into Sydney's drinking catchment.

For the reasons outlined above, I believe that the Commission should refuse the application as proposed. No amount of mitigation measures can resolve the fundamental flaw presented by the lack of site suitability. It must be rejected and not proceed.

Yours sincerely,

Jacqui Scruby

Independent Member for Pittwater, NSW Parliament
