



JEREMY WATERS

OBJECT

Submission ID: 218275

Organisation: N/A	Key issues: <i>Social impacts, Visual impacts, design and landscaping, Land use compatibility (surrounding land uses), Traffic, Other issues</i>
Location: New South Wales 2577	
Attachment: Attached overleaf	

Submission date: 11/25/2024 2:00:37 PM

My name is Jeremy, and our home is 1.8 km from the proposed site.

The Federal Government aims to triple the plastic re-cycling rate by 2030.

On the NSW Govt website, the Federal Minister for the Environment and Water, the Hon Tanya Plibersek says, Labour is driving the transition to a circular economy by 2030. It's good for the economy and great for the environment.

This intent is admirable. The execution, in this case, is abominable.

To simply plonk Australia's largest plastic recycling facility, on unsuitable land and a two-minute drive from Moss Vale's main street is not the way to achieve these outcomes.

There are far too many What Ifs associated with this site for it to be viable.

All of these What Ifs translate into undeniable risks that are irresponsible to ignore.

What if there is a catastrophic fire on the site?

74-76 Beaconsfield Road is on Fire Prone Land. (See attached screenshot from NSW RFS website).

Moss Vale does not have the fire and rescue infrastructure to cope with a worst-case scenario at this site. Moss Vale's fire station is unmanned ie there are no firefighters permanently onsite. It is a retained fire station. This is also the case for the nearest stations in the region- Bowral, Mittagong and Bundanoon. Casting a wider radius, you will also find retained stations at Camden, Warragamba and Ingleburn. All these stations are made up of RFS volunteers who are on call at home and at work should a fire break out. Some of them might not even be available when the call comes in.

Moss Vale has only three fire trucks at their disposal. The response time for back-up will be 25- 35 minutes at best for the next engine. Should a fire quickly burn beyond suppression level (and indications suggest it would, given the chemicals and waste volume onsite as well as undetected combustible material) there are NO local or adjacent fire control appliances capable of putting such a fire out. They would not have sufficient access or range of height to combat a conflagration covering an area four stories high and 30,000 hectares.

This is grossly inadequate for a major industrial processing fire.

On December 22, 2022, a recycling centre at Hume, Canberra went up in flames due to the presence of a small number of lithium batteries in the waste compacter. It is nearly impossible to guarantee that such items will not be missed and extracted.

The fire burnt for several days before it was finally extinguished. This fire was attended by crews from several stations that were manned 24/ 7 within a 10 KM radius including a hazmat crew.

The Hume centre stored 150 tonnes of waste at the site.

Plasrefine intend to store 20,000 tonnes of plastic waste at this facility.

130 x more waste than the Hume facility.



Which burnt to the ground.

The proposed GHD landscape plan shows the new æbushland (including mature Eucalyptus) to be planted (as well as highly sloped mounding built) within six metres of the building.

This would trigger a much higher bushfire attack level and makes the proposal non-compliant with the Planning for Bushfire Protection 2019. This would further hinder access for fire fighting vehicles and limit the asset protection zones required for a building of this scale.

The patented formula that Plasrefine plans to wash the plastics with is made from highly flammable chemicals- tea tree oil, turps and 80% ethanol.

Since 2019, there have been 20 major fires in Australia at re-cycling facilities connected with plastic waste. The risk of a catastrophic fire at this site is, clearly, very high. With residents living only 150 metres away, childcare centres operating 650 metres away and the Garvan Institute only 50 metres away, this risk cannot be worth taking.

On November 19, NSWFR Bowral Station posted a message on their website to clarify that they were not a permanently staffed station. Explaining this model they stated, ælt is a system which underscores the community-orientated nature of Bowral Fire & Rescue, with local firefighters ready to serve at any time of day or night.

It is disgraceful that the risk and toll of managing this potential catastrophe is put back on the community. If there is a massive fire on the site then it's volunteer locals, our family and friends, who are being called in to fight it without adequate equipment, backup or access. That this is the blithe expectation from Plasrefine and GHD tells you everything you need to know about their ~concern' for the Moss Vale community.

What if Moss Vale's thriving economy and local businesses are affected?

We run an Air B'N'B on Berrima Road approximately 1.8 KMs from the proposed site. The presence of this facility will have a massively detrimental impact on our business. Who wants to rent a home close to a gigantic plastic recycling plant?

This impact will be felt across the wider Moss Vale economy which relies heavily on the agriculture, wine and tourism industries. All of these industries will be terribly damaged by the presence of this facility dumped so close to the heart of Moss Vale. Who wants to holiday near a gigantic plastic recycling plant or buy produce from land near it?

Moss Vale is thriving. House prices have increased 45.5% in the last 5 years. Much of this is due to the impact of the Covid lockdowns. As people work from home and want to raise their children in this beautiful, rural environment, many young families are moving to the region. Schools are bursting and day care centres have two year long wait lists. All this growth and possibility will all be curtailed if Plasrefine goes ahead. We are already hearing stories of real estate agents being asked not to show any properties near the proposed site.

Plasrefine has trumpeted that the site will employ 140 workers so the local economy will benefit. They have not stipulated that these 140 workers will be recruited locally. In the EIS Chapter 7 (p24) they state that it will be, æquite a number of years before these staff n numbers will be achieved. They also state that these jobs will be in the resource recovery sector, implying that not all these jobs will be at the facility.

Regardless, 140 jobs at the plant are hardly a game-changing job boost for the people of Moss Vale. To put this in perspective, the local McDonalds on Robertson Road employs approximately 100 people so Plasrefine's job numbers are not the economic shot in the arm they are making them out to be.

What if local roads and infrastructure are not compliant with 100 trucks rolling onto the site five days a week?



GHD plans to build a new access (Braddon and Braddon Road East extension) for their trucks to use. The construction period of one month quoted in GHD's slide presentation for this road is farcical. With the topography of the land and the amount of work required, it will clearly take much longer. The danger to and disturbance for the residents of these narrow residential roads is untenable as is the cost to the ratepayers of the repair of these roads due to damage caused by construction vehicles.

The Wingecarribee Council does not agree with these roads being used, however the GHD has repeatedly said that this is their legal access.

The EIS states if construction of the new access road is delayed because of land acquisition issues, the proponent would need to use Beaconsfield Road for construction access until the new road is available. (7-10).

This is one of countless examples of the wishes of local representatives being brushed aside by GHD/ Plasrefine.

The EIS does not take account of the six truck movements per hour, 100 per day that will occur at the site. These trucks will be queueing at the site, diesel engines running, reversing at times and emitting noisy reversing signals. GHD have said that the trucks will have to turn their engines off while queueing. This is unrealistic as it is detrimental to diesel engines and drivers will not want to sit in trucks in winter or summer without aircon.

Lack of compliance, here, will not be monitored.

The 24 hours per day, 7 days per week operating hours of this facility will mean that workers' cars will be arriving and departing, forklifts will be operating and emitting reversing signals, equipment will be operating and creating noise and vibration. This will be torture for nearby residents.

What if the release of micro-plastics into the air and waterways threatens the long-term health of thousands?

In his presentation to the IPC, Chris Ritchie from the DPHI made the claim, several times, that the facility is fully enclosed which will mitigate issues around air, noise, micro plastic escape etc. This was a key factor in his approval of this facility on this site.

This claim is wrong. This site cannot be a NIL discharge sight. This has been acknowledged by GHD, During operation there would be potential for low levels of particulates and volatile organic compound emissions from granulation and injection and extrusion moulding units. Products such as doors and chairs produced in Building 2 would require milling to size or profiling. These activities have the potential to lead to the emission of particulate matter.

'Particulate matter', or micro plastic materials containing toxic chemicals, can be discharged into the air and waterways through storm water collection, the westerly winds blowing through the roller doors, as well as via the vents and stacks onsite.

The proponent plans to mitigate emissions using fast-acting roller doors. With trucks queued up outside the facility, these doors will be frequently opened, if not left open for long periods of time. At the public hearings, GHD admitted that, with the number of trucks coming through, the roller doors would be open 5 hours a day-three minutes to roll in then three minutes to roll out. Per truck. Within three days of this statement, GHD have now revised this to 45 minutes per day. This new time estimate, given the number and size of trucks, the manoeuvring required and the time it takes to unload, reload and exit, is clearly unrealistic. GHD/ Plasrefine are making this up as they go along.

An illuminating exchange between Janet Milligan (IPC panel member) and Chris Ritchie from DPHI occurred on day three of the public hearings (12/ 11/ 2024):

MS MILLIGAN -The doors are open for at least 5 hours a day. Do you have any response to that?



MR RITCHIE “ In terms of the period of five hours that you mentioned, I might take that particular time and question on notice and I'll come back with a response, because that's “ as I've said before, generally it's fast and closed and then while that facility is operating, which is spelt out in the conditions, the doors have to remain closed while they're operating. But again, I'll take that question on notice and I'll come back with some more detail.

MS MILLIGAN- The information was actually given to us by the applicant. Their estimate is that with the first opening doors, they need to open, the truck needs to come in, they'll close, and then they need to open, truck goes out. And thinking at full capacity with the truck movements, they estimate the opening to be five hours a day. I guess I'm asking you the question, your comment that a lot of the risks are managed by the fact it's an enclosed building, does five hours a day opening change that view on any of that?

MR RITCHIE- I mean, generally from an acoustic point of view, the facility “ I mean, there are doors that will primarily be closed, but our conditioning will be saying that only while the doors are closed can the site be operating. So, from a noise impact, from an air impact, because they have to be shut while it's operating, I would say that the outcomes of the assessment would remain that those criteria would be addressed. But in terms of the particular 5 hours, I just want to take that away and take that on notice and look at that a bit more and come back to the IPC.

The DPHI have, clearly, not given GHD's plans the rigorous scrutiny required and have signed off on a project that they don't fully understand.

NSW Health, who supplied no comment or advice re: Plasrefine, states on their website:

A secure and safe supply of drinking water is fundamental to public health. The NSW Government has endorsed the Australian Drinking Water Guidelines 2011 (published by the National Health and Medical Research Council and the Natural Resource Management Ministerial Council). The guidelines provide a solid foundation for assessing drinking water quality, by specifying health-based and aesthetic criteria as well as the philosophy of a "multiple barrier approach" from catchment to tap, so to ensure safety of the water.

We have seen none of this in action from GHD/ Plasrefine/ DPHI.

What if the location is wrong?

The proposed site is a predominately rural landscape right next to a riparian corridor, on the water catchment, in the middle of beautiful, green rural, country that is abundant with wildlife. Plasrefine plans to cover 6 of the 7.7-hectare site with buildings up 18 metres high. This is not, at all, compatible with the gentle pastoral landscape that it wants to build on.

The site is 150 metres from residents (90 metres if you count the newly zoned residential land) and 650 metres away from the nearest childcare centre.

It is only 50 metres from the world renowned Garvan Biomedical Research Institute. This facility is the only source of mice bred in climate and hermetically controlled conditions in Australia which are used for critical research and study of rare cancers and genetic diseases. Damage to this unique facility would be disastrous.

The site is a jarring contrast to the location pattern of other Australian- based plastics recycling facilities that perform the same job as Plasrefine- converting collected plastics into reusable forms like flakes and pellets. Facilities like:

Gold Rec Australia in Menangle

Circular Plastics in Ettamogah

Kangaroo Plastics in Campbellfield Victoria



YCA Recycling in Wingfield SA

Parks - When built will be based at the Parkes Special Activation Precinct in regional New South Wales. (7km from the nearest residential areas)

The facilities listed above are all on zoned land surrounded by land of similar zoning with the nearest residential zones between 2 - 7km away. Not 90-240 metres away as Plasrefine will be if approved. They operate away from residential areas, day cares and schools so that air and water pollution, risk of fire, truck disturbances, noise, smell and environmental impacts are mitigated.

What if children are forced to play inside on windy days?

On especially windy days, Plasrefine have asserted that they will advise nearby residents to stay indoors' to mitigate toxic fumes coming from their smokestacks. This is a ridiculous and insulting expectation to hoist on the people of Moss Vale. People live, work and play outdoors in this area. Rain, hail or shine. Or wind. Its why people move here and choose to raise their children here. To suggest that we simply move our kids indoors on especially windy days demonstrates just how out of touch Plasrefine is with the local community.

What if the stress felt by residents creates deep mental health problems throughout the community?

This project has the potential to have a devastating social impact on the people of Moss Vale. This region is famous for green rolling hills, clean air, food and wine. This hazardous factory threatens to destroy the social fabric, economy, culture and environment of our peaceful community. The psychological impacts of this are real and frightening.

Four years ago, ON CHRISTMAS EVE, a white envelope was dropped into the letterboxes of locals living close by the site informing them of Plasrefine's plans. Ever since then, many in the Moss Vale community have been wracked by the stress and tension of fighting this proposal. The threat of their landscape and way of life being irrevocably damaged has already contributed to a decline in mental health for many locals. I shudder to think of the consequences if building is approved. It makes no sense to plonk a hazardous waste facility onto a beloved rural setting and water catchment right by a peaceful, thriving community. Just because you can doesn't mean you should.

These are just some of the What ifs that have been triggered by this proposal. Many in our community have excavated these risks with precision and substance. With minimal oversight and transparency, the onus for properly scrutinising and evaluating the proposal has been hoisted onto the shoulders of the people of Moss Vale. We have received no cast-iron guarantees or foolproof plans to eliminate the many risks identified. Indeed, on this site it seems impossible to mitigate let alone eliminate many of these risks. To then move ahead, despite this litany of challenges, would be dangerous and defy logic. This site, on unsuitable land and a mere 150 metres from residential property cannot be turned into the front line of a battle against plastic waste.

In their decision to recommend approval for GHD and Plasrefine's development, it seems that the DPHI have been caught up the rush to meet the quotas of its government masters. By ignoring the glaring discrepancies in the proposal, they have prioritised targets and political capital over the safety and well-being of this town and its surrounding region.

There is a stark contrast, here, in what's at stake for the people of Moss Vale and the consortium of GHD/ Plasrefine. For the people of Moss Vale, their way of life, their physical health, the health of the rural landscape and the future of our children is at stake.

For GHD/ Plasrefine, what's at stake is money.

If this enormous project doesn't go ahead on this site, the GHD/ Plasrefine consortium will be OK. They'll live to fight another day and, eventually, build somewhere else. Hopefully, on a more appropriate site. But, if this

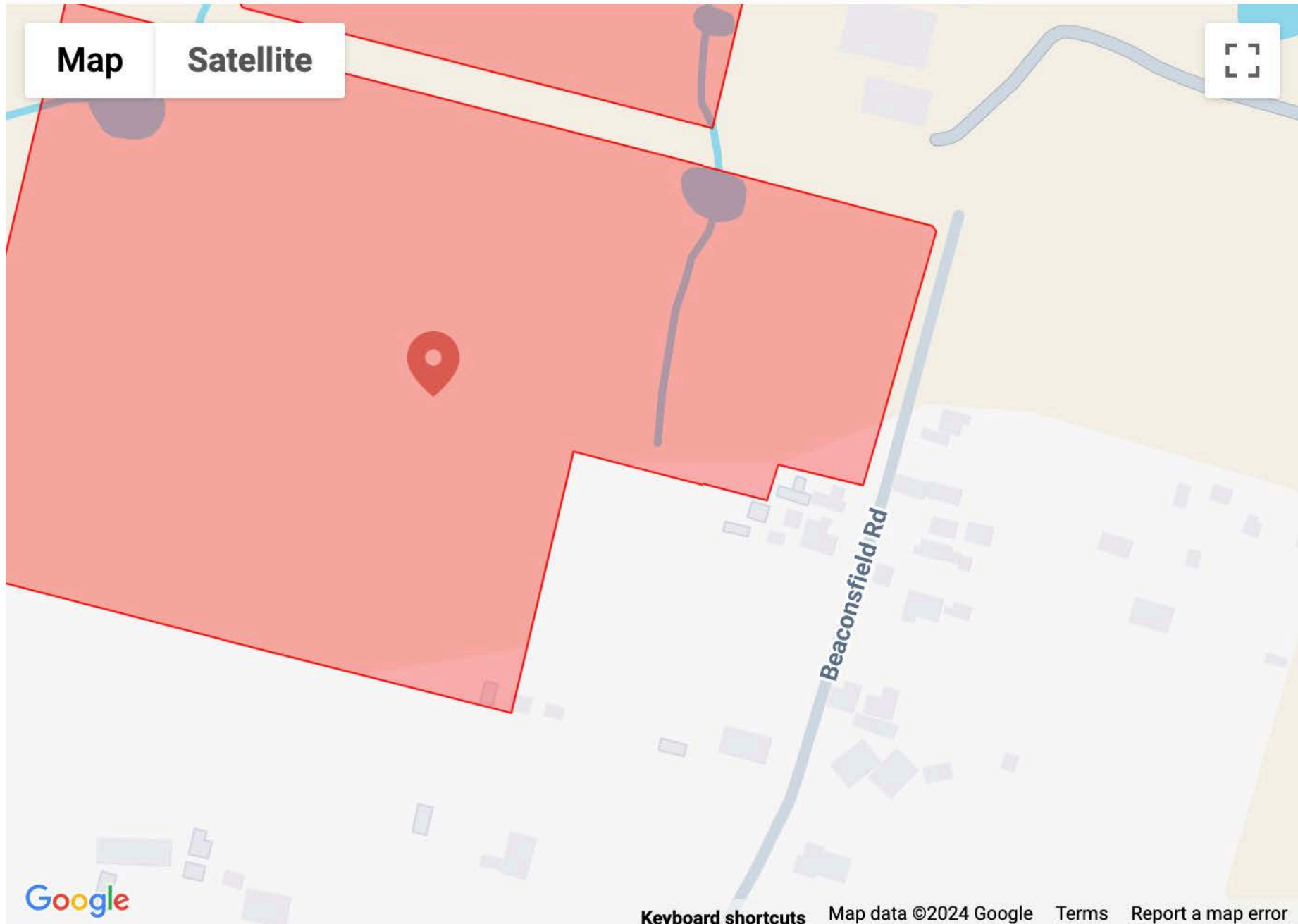


project does get approved, then the disruption and trauma to the lives of Moss Vale residents will be profound, indeed, catastrophic.

On one side of this ledger, you have plastics and profit-margins. On the other side, you have people.

NSW and Australia need robust and comprehensive recycling policies. The challenges our planet faces from the poisons of plastic waste are real and need to be effectively addressed. But 74- 76 Beaconsfield Rd, Moss Vale is not the place to do it. There are too many things that could go wrong on this site. The price is way too high to pay if, and when, they do.

Thank you for your consideration.



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