



SUSAN STANNARD

OBJECT

Submission ID: 218316

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

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My submission is attached.

25 November 2024

NSW Independent Planning Commission
ipcn@ipcn@wsc.nsw.gov.au

Dear Commissioners

**Re: Moss Vale Plastics Recycling Facility
Submission of Objection**

I have been a resident of the Wingecarribee Shire for 33 years. I hold a Bachelor of Economics and a Master of Town and Country Planning, both from the University of Sydney. For the past 20 years I have worked at Wingecarribee Shire Council within the strategic land use planning team where I am currently the Coordinator Strategic Policy.

However, this is my own private submission, the focus of which is to question why no consideration seems to have been given to alternative sites which are already strategically and legislatively supported at the state level as appropriate for the location of facilities specifically intended to contribute towards the circular economy.

Council's submission to the Public Meeting of 12 November 2024 concluded with the following statement:

Yes, we need a circular economy and recycling of plastics is central to its success. Perhaps a more proactive strategic approach at the state level could be to identify potential sites across the state where such recycling facilities could be best placed to optimise access, minimise community impact and more equitably share the burden. If such an analysis were undertaken, it is highly doubtful that the proposed Plasrefine site would be on that list.

In fact a comprehensive strategic effort to move towards a viable circular economy has been underway within the NSW government since at least 2021, which begs the question as to why that strategic effort has not been referenced or considered in the assessment of the Plasrefine proposal.

In June 2021, the NSW Department of (then) Planning, Industry and Environment published the NSW Waste and Sustainable Materials Strategy 2041(1) to facilitate the transition towards a circular economy.

In support of that Strategy, the NSW Environmental Protection Authority (EPA) published its Energy from Waste Policy Statement in 2021 (2) together with its Energy from Waste Infrastructure Plan (3).

Energy from Waste (EfW) is a form of thermal energy recovery which can be used to generate electricity or used directly in machinery, vehicles and industrial processes. The NSW Government's Energy from Waste web page (4) provides a summary of this process and its potential contribution towards circular economy goals.

The EfW Infrastructure Plan, identifies four EfW Priority Infrastructure Areas across the state, their locations due, in part, to their being at least 140 km from Sydney and

- Away from high density residential areas
- Close to existing or planned infrastructure
- Connected to existing or planned road or rail infrastructure

The four nominated EfW Priority Infrastructure Areas are:

1. West Lithgow Precinct

2. Parkes Special Activation Precinct
3. Richmond Valley Regional Jobs precinct
4. Southern Goulburn Mulwaree Precinct

The location of these Precincts has been strategically considered and supported by State agencies both financially and through legislated environmental protection standards under *State Environmental Planning Policy (Transport and Infrastructure) Amendment (Thermal Energy from Waste) 2022*. (Chapter 9 Part 4).

It is understood that the proposed Plasrefine facility is not an EfW facility, however, it is also noted that the Precincts nominated for EfW facilities do not have to be exclusively used for that purpose.

The EPA's EfW Infrastructure Plan notes that

the Southern Goulburn Mulwaree Precinct and associated infrastructure is co-located and integrated with other resource recovery, waste management and renewable energy generation and has existing infrastructure in place to import waste from Greater Sydney and other regional locations.

An excellent demonstration of this integration and co-location of waste management facilities is a plastics recycling facility in the final stages of construction within the Parkes Special Activation precinct in the Central West region of New South Wales. The facility is supported by funding from the Australian Trade and Investment Commission and Invest Regional New South Wales and both organisations feature the facility on their website. Expected to be functioning by 2025 and capable of processing some 200,000 tonnes of waste plastics per annum, it will be operated by the US based 'waste solutions' business, Brightmark.

The Invest Regional NSW (5) website reports that the company "received extensive support from the Department of Regional NSW, a Jobs Plus Grant from the NSW Government and support from the Commonwealth Government's Global Business and Talent Attraction Taskforce."

Bob Powell, Founder and CEO of Brightmark is quoted as saying that, 'collaborating with the NSW Government in their Parkes precinct is ideal due to its strategic location and circular economy principles, its sustainably minded business environment and community, and its location as a transportation and logistics hub.'

The imminent completion of the Brightmark plastics recycling facility demonstrates that these Priority Infrastructure Areas can provide excellent opportunities for the co-location of a range of facilities, including a plastics recycling facility, all contributing to the creation of a circular economy, where they can operate more efficiently and to a higher environmental standard within EPA controls and Regulations already legislated to ensure environmental and community protection.

It is difficult to understand therefore why there is no record of similar engagement between either Austrade or the State Government and the Plasrefine owners as occurred with the Brightmark facility.

The Invest Regional NSW's website proudly declares that:

Our dedicated regional investment attraction team provides tailor-made investment facilitation and information services for domestic and international investors, including site selection, financial support and bespoke workforce development.

The Invest Regional NSW website also offers streamlined planning support to enable faster decision making. No doubt the Plasrefine proponents would have welcomed such advice and support. Such outreach may have also enabled Plasrefine to pursue a more advanced recycling process rather than

the current mechanical process with all its environmental disadvantages. The Brightmark facility at Parkes will utilise pyrolysis, the thermochemical decomposition of organic material at high temperature.

The 'Austrade' website (6) quotes Adjunct Professor Rose Read, from the University of Technology's Sydney Institute for Sustainable Futures, stating that the facility "means there is a whole range of plastics that previously couldn't be recycled through the mechanical process but will now be able to be recycled".

A comprehensive report by the CSIRO, published in 2021, discusses the environmental benefits of pyrolysis. (7) A research paper published in October 2024 (8), authored by scientists from the Bren School of Environmental Science and Management, University of California (Santa Barbara) and the Department of Civic and Environmental Engineering, University of California (Irvine) concludes that pyrolysis can eliminate more than 99% of PFAs, microplastics and PPCPs from biosolids.

Had Plasrefine received support from the Department of Regional NSW, together with a Jobs Plus Grant from the NSW Government and support from the Commonwealth Government's Global Business and Talent Attraction Taskforce, all of which Brightmark received, it too may have been able to locate within one of the designated EfW Priority Infrastructure Areas across the State, especially as one of them, the Southern Goulburn Mulwaree Precinct, is located some 70km from Moss Vale. It may have even been able to consider opportunities outside the region or even the state.

With the benefit of state agency financial and technical support, Plasrefine may have been able to take advantage of more advanced technology rather than relying on mechanical processes that involve the shredding of plastics, a known source of microplastic creation and emissions.

Even the European Commission has developed an *EU Plastics Strategy, a Circular Economy Action Plan and a Zero Pollution Action Plan*, which to address concerns about "the growing presence of microplastics in the environment". (9)

The consistent strategic initiatives undertaken by the State government and agencies over the past few years, resulting in the identification of specific precincts within which recycling facilities can co-locate, are to be applauded. The facilities being located in these designated precincts are state of the art and seem to offer more positive environmental outcomes that the Plasrefine proposal can afford.

With financial support, Plasrefine may have also been able to take advantage of more advanced recycling solutions rather than having to address resulting microplastic pollution with little more than roller doors, wind resistance and static pressure.

So much financial and technical support has been offered to other recycling enterprises, at far greater expense that the \$88 million 'investment' the Plasrefine facility will inject into the NSW economy.

The Southern Goulburn Mulwaree Precinct has been strategically identified by the NSW State Government itself. It is far more accessible and serviceable than the Moss Vale site for the high volume heavy vehicle traffic such projects require. Trucks from the south would drive past it on their way to the proposed Plasrefine site. From the north, trucks could be half way to the Southern Goulburn Mulwaree Precinct by the time they have left the motorway and navigated their way across to the Plasrefine site.

It is not too late for the State Government to step up and offer support to Plasrefine to enable it to reconsider its options, particularly its location. In fact, the timing could not be better.

The NSW Government's Waste and Sustainable Materials Strategy 2041 is due for review by 2025 which is now. Such a review would provide the government with the opportunity to recommit to achieving the targets and good intentions espoused in all of the policy statements, strategies and infrastructure plans introduced over the past four years.

In so doing, the relocation of the Plasrefine proposal to the South Goulburn-Mulwaree Priority Precinct, together with funding support to upgrade the standard of its plastics recycling processes would be an action of considerable benefit to the circular economy as a whole, as well as to the environment and broader community.

My request to the Independent Planning Commission is that it reject the Plasrefine proposal at its current location for all the reasons with which by now the Commission will be very familiar, and encourage the state government to acknowledge that, instead, there is an opportunity to establish an improved form of plastics recycling in a far more suitable location, one strategically prioritised and legislatively supported, with enforceable environmental protection controls already in place, a location which would quite probably provide a more economically sustainable business opportunity for the proponent than the current location could ever offer. For the state government to ignore this opportunity is to abrogate its responsibility to the community it serves and to the objectives of the circular economy it seeks to support.

Returning to the concluding comment from Council's submission to the Public Meeting of 12 November 2024, it is encouraging to note that 'a more proactive strategic approach at the state level to identify potential sites across the state where such recycling facilities could be best placed to optimise access, minimise community impact and more equitably share the burden' has indeed been undertaken. Now is the time to implement it.

Yours sincerely

Susan Stannard, B.Ec (Syd), MTCP (Syd)

References

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4. <https://www.planning.nsw.gov.au/assess-and-regulate/state-significant-projects/energy-from-waste>
5. <https://www.investregional.nsw.gov.au/success-story/brightmark>
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