



WENDY TUCKERMAN MP

OBJECT

Submission ID: 218303

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 2580	
Attachment: Attached overleaf	

Submission date: 11/25/2024 2:39:59 PM

Submission to the IPC by

Wendy Tuckerman MP

Member for Goulburn

Objecting to SSD-9409987 " Moss Plastics Recycling Facility Proposal

As the State Parliament representative for Moss Vale, I will present several important concerns regarding the proposal to construct Australia's largest plastics recycling facility in Moss Vale.

Primarily, the proposed site is in no way appropriate for such a facility due to its close proximity and impact to residential areas and community facilities, the risk to the Sydney drinking water Catchment Area, the potential impact to Australian BioResources (ABR) and their biomedical research for Australia.

The Southern Highlands Innovation Park (SHIP) received \$270,000 in funding from the NSW Government to develop a guide for effective planning of infrastructure and investment in the Southern Highlands. The Plasrefine proposal is in direct conflict with the intent of this planning framework. The draft structure plan for SHIP designates heavy industrial uses to the eastern section of the precinct, encouraging sustainable resource and waste processes.

The location of the proposed plastics recycling facility, just 200 meters from the nearest residence, is one of the reasons that many in the community have raised significant objection, particularly as the area is designated for productivity support rather than heavy industrial use and the significant risk posed by fire. No other facility of this kind in Australia operates closer than 1 kilometre to residential areas.

The local Council's planning professionals have expressed strong opposition to the State Significant Development (SSD) proposal in its current form and location. Their concerns have been communicated to the relevant Department, but many of these issues remain unresolved or with hypothetical solutions, indicating a lack of strategic merit in the proposal.

Technical concerns, such as filtration systems, vibrations, stormwater management, and firefighting capabilities, must be addressed.

Even if the proponents contained microplastic pollution from the site (which the research suggests is impossible), it cannot prevent catastrophic pollution that would result in a fire.

Fires are common in plastics recycling facilities due to the high flammability of plastic products. This Google map document is a compilation of plastics recycling fires since 2019. It indicates that there have been 100 such fires globally.

Even worse, the site sits within bushfire prone land as this simple bushfire prone land checking tool on the NSW Rural Fire Service (RFS) website demonstrates. Simply entering the address of the proposed facility (74-76 Beaconsfield Road Moss Vale) into the RFS site clearly demonstrates that the site is indeed on bushfire prone land. However, in the EIS, the proponent has incorrectly claimed that the site is not bushfire prone, by relying on out-of-date bushfire mapping.



The proponent's reliance on bushfire mapping that has not been updated since 2011, is deeply troubling, more so a planning department that has overlooked such detail and made recommendations for approval. Ignoring the bushfire risks associated with this site fosters the perception that safety and due diligence are being sacrificed for expedience.

The Act requires the Consent Authority to consider the provisions of any environmental planning instrument or regulation relevant to the proposal. The storage of 20,000 tonnes of flammable materials in a bushfire prone area would seem to make the bushfire regulations extremely relevant.

A fire at this site would result in major microplastic and other toxic pollution that would impact Sydney's drinking water due to the site's location.

In the event of a fire, the Southern Highlands have limited fire-fighting capabilities and resources to manage the scale and ferocity of such a toxic emergency. Local fire stations are not staffed 24/7. We are advised that in the event of a fire, crews will be called from Moss Vale, Mittagong and Bowral. With only 3 class 2 pumper trucks, and 1 Hazmat tanker, support would need to come from Campbelltown or Wollongong, at best 45 minutes away.

The proximity to residential homes is devastatingly close and the risk to human health from toxic plumes, combined with strong westerly winds, and an uphill gradient towards homes, is unacceptable.

Additionally, the assessment report raises issues regarding emerging contaminants, including PFAS. Given the site's location in a drinking water catchment area, adjacent to a first-order riparian corridor, and close to residential development, these risks are unacceptable.

Moreover, the proponent has openly acknowledged their lack of prior experience in recycling plastics. A key figure in this project is an individual based in Beijing, whose associated companies have faced penalties from local environmental authorities.

According to the Department of Planning's recommendation report, the applicant must not receive or process more than 120,000 Tonnes of mixed waste plastic annually"this includes several types of plastics, such as PET bottles and high-density polyethylene. The Australian Institute of Research reports that there are thousands of distinct types of plastic, and they cannot be recycled together. This is particularly challenging in the case of composite plastic items such as PET bottles which have HDPE lids, the two cannot be recycled together, so they must be separated prior to recycling. Coloured bottles, for example, cannot be recycled alongside clear bottles.

There are significant concerns surrounding the monitoring of feedstock at the facility particularly based on the proponent's past environmental performance, which gives reason to question the effectiveness of monitoring waste processed at the facility and the assurance that environmental standards will be maintained at the site. The Institute also advises that plastic recycling creates pollution through the shedding of microplastics which end up in the environment through wastewater or sludge from processing plants.

Research has found that enormous quantities of microplastics are generated in the recycling process, and that, as a result, recycling centres are likely to be a major point source of microplastic pollution.

In conclusion The Australian Institute of Research' report detailed that æthe recycling process sheds high levels of microplastics, which is just one way that plastics create environmental and health issues. Given this, it is hard to see the idea that Australia will recycle our way out of the plastics waste crisis as anything more than greenwash.

While the proposal claims that risks associated with microplastics can be managed, it acknowledges gaps in legislative requirements for their complete removal from wastewater. This raises significant concerns regarding the potential long-term impacts on both environmental health and human health arising from microplastics generated by the facility.



GHD, the company responsible for delivering the Plasrefine proposal boast on their website that "Access to safe, affordable and reliable water is a fundamental human right and plays an increasingly crucial role in every part of the global economy, and yet it is one of our most undervalued resources, however they (GHD), have shown little regard for the community's concerns about the impact pollutants will have when reaching the Sydney Water Catchment. It is also distressing to hear that in their response to concerns from the community regarding toxic PFAS and microplastics in the air, GHD suggest that close receivers could just stay indoors.

The community anticipates 100 truck movements each day "50 inbound and 50 outbound" within a 24-hour period. This translates to approximately 10 heavy vehicle movements per hour, in addition to 280 light vehicle movements daily.

The Department has insisted that the development must not cause vehicles to queue on public roads, nor should heavy vehicles or bins be parked on local roads or footpaths. However, the site plans indicate only one designated area for truck parking and a single access road in and out of the facility. This raises concerns regarding potential traffic congestion and the likelihood of trucks using local roads, which would disrupt the community.

Neighbouring the proposal is the Australian BioResource's (ABR), a not-for-profit organisation making a unique contribution to biomedical research in Australia, through the breeding of 800 specialised genetically modified mice distributed to universities and medical research institutes across Australia. Any impacts on the specialised mice bred at ABR may have wider impacts on biomedical research in Australia. I note that ABR has expressed concern about the potential impacts of noise, vibration, and particulate and noxious gas emissions on its mice. Any threat to this world-leading research is unacceptable.

It is concerning to note that vibrations from recent infrastructure developments have negatively affected these valuable research subjects. Given the uniqueness of this facility on the Eastern Seaboard, any approval for the plastics recycling project will require stringent risk mitigation measures. There is also a pressing need to consider the enforceability of these mitigations.

Considering recent heavy rain events leading to rapid water flow on the site, it is crucial to mention that the Wingecarribee River Flood Study applies to this land. The site's western end is classified as Category 2 Riparian Land, which connects to the Sydney Water Catchment.

The substantial risks associated with this specific project, on this site if approved, may have catastrophic consequences for residents of the Moss Vale, surrounding communities and the Sydney Drinking water catchment.

This proposal not only presents immediate risks to the Moss Vale community but also sets a concerning precedent for future development in residential areas. The identified inconsistencies coupled with the broader planning failures pose significant risks to the community and the environment.

I urge the IPC to consider the irreversible impacts an approval of this project in this location could have on Moss Vale's residents, natural resources, and essential services. The Southern Highlands deserves thoughtful, sustainable development that aligns with community expectations and supports, rather than endangers, our people and our region's future.

Public Trust in the proponent, GHD, the NSW Planning Department and the broader planning system, including the IPC is integral to effective governance.

Considering these concerns, it is clear: This is NOT the right site for this proposal.

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New South Wales Government
Independent Planning Commission

Member for Goulburn

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