



WILLIAM MATHEWS

OBJECT

Submission ID: 217771

Organisation: N/A	Key issues: Social impacts, Other issues
Location: New South Wales 2577	
Attachment: Attached overleaf	

Submission date: 11/24/2024 6:17:13 PM

SSD-9409987 - Plasrefine Moss Vale, NSW 2577

As a local resident who lives within 5km (downstream and downwind) from the proposed development, I strongly oppose the development on the following bases:

1.

[REDACTED]

2. The various methods proposed to contain gross plastic waste during the receival process are inadequate and cannot guarantee plastic waste will be confined to the site. These methods in essence include closing a roller door behind trucks entering the facility before unloading, and also sending employees to collect any material that escapes the enclosed dock area in the event that it does. If the primary method is effective (closing the roller door), presumably there should be no need for a secondary plan to collect any rubbish thereafter. It is inevitable that gross plastic waste will increase as a result.

3. The various methods proposed to contain and remove microplastics and other harmful chemicals from any water discharged from the facility are inadequate. The proponent and its agents have not demonstrated that they will meet the Trade Waste requirements or comply with Water NSW regulations in regard to water discharged from the facility and they have not provided the IPCN with full and comprehensive technical analysis detailing the initial scope and subsequent management of the filtration processes involved in regard to water intended to be discharged into the local sewer system. Any filtration method employed by the proponent (gravity, pressure, vacuum, chemical / rotary drum, plate, sand etc) will emit microplastics into the filtered water. No qualitative measure of emissions contained in the water intended to be discharged into the sewer system has been provided by the proponent (for instance, 'microplastics above 5 micron will be filtered out' / 'microplastics below 5 micron might remain in water intended for discharge into the sewer system'). The proponent's agents GHD have only referred to the nature and quantity of these emissions as 'negligible' in every public communication when these emissions are, in fact, not only estimable but calculable.

4. Volatile airborne compounds will be generated during the operation of the facility during plastic melting processes and the proponent has not demonstrated that adequate filtration mechanisms will be employed so as not to breach the Protection of the Environment Operations Act 1997.

See:

The pollution characteristics of odor, volatile organochlorinated compounds

and polycyclic aromatic hydrocarbons emitted from plastic waste recycling

plants' by Chung-Jung Tsai, Mei-Lien Chen, Keng-Fu Chang, Fu-Chang and IFeng Mao dated February 2009, published by National Library of Medicine (National Center for Biotechnology Information)

<https://pubmed.ncbi.nlm.nih.gov/19091382/>



In conclusion, close proximity to the Wingecarribee River (and in turn the Sydney water catchment) and also residential areas of Moss Vale and Berrima makes this proposal unacceptably risky. Given the proponent's history of environmental breaches in multiple countries, the methods proposed to contain, remove and minimise contaminants issuing from the facility, and the inevitability of an increase in land, air and water contamination makes the proposal an unacceptable risk, particularly at this location.

With respect I request the Commission consider an alternative site and an alternative operator.

Kind regards,

Will Mathews

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This submission refers to the proposed **Moss Vale Plastics Recycling Facility (SSD—9409987)**.

The submission is made by [REDACTED] on behalf of the *Moss Vale Matters Community Group*, a not-for-profit group of community members and sensitive receivers formed as a result of the significant community concern at the proposal, proposed site and lack of due diligence of EIS process, consultation and documentation.

We declare that no reportable political donations have been made to the above.

We strongly *object* to this proposal for the reasons outlined below:

EIS Issues	Details of objection
EIS certification	
Concerns regarding EIS certification/sign off	<ul style="list-style-type: none"> - Noting the complexities of the myriad legacy planning and zoning issues in and around the proposed site, the suitability of the EIS being certified by someone without formal strategic planning qualifications is noted as of concern. - This is in circumstances where an inadequate assessment has been carried out in respect of the suitability of the site, considering the complex (and inconsistent) strategic planning considerations, and the bulk, scale and intensity of the proposed development and its adverse and irreversible impacts on the environment and amenity of the surrounding residential and rural land uses.
EIS Lack of appropriate rigour	
EIS documentation does not contain enough detail to fully understand the true nature of the proposal, how it will operate, how impacts will be mitigated	<ul style="list-style-type: none"> - Architectural documentation provides no real developed information—it is schematic and inadequate. - No land surveys have been provided, which is inadequate for the purposes of the EIS. - There is no civil or stormwater documentation which depicts the major construction challenges or mitigation approaches. - Detail provided about plant design is wholly inadequate and impacts ability to understand related impacts, e.g. noise (how will it be managed/mitigated), air quality (what equipment will be used to manage air quality impacts—only details vague reference to ‘state of the art technology’, but not how or what this comprises), noise, site access (many and often conflicting options put forward by the proponent provides neither clarity nor confidence) - Noise and pollution impact from both construction and operation of the plant, as well as noise and pollution from hundreds of truck movements per week along narrow, unsurfaced (in places) country roads (servicing multiple residential properties), are inadequately examined or explained.
Proposal justification	
EIS assessment of justification for the project is unsatisfactory and fails to demonstrate merit or support	<ul style="list-style-type: none"> - The proposal is inconsistent with local strategic planning objectives - The proposal design fails to adequately identify, or demonstrate a viable response/mitigation for:
Claims that the proposal is suitable for the site are demonstrably incorrect and misleading	<ul style="list-style-type: none"> → opportunities and constraints of the site, e.g. legacy zoning issues, topography → accessibility, traffic and transport constraints → environmental impacts associated with construction and operational phases of development. - The scale and purpose of the proposal is highly unsuitable for the site, situated as it is: <ul style="list-style-type: none"> → adjacent to sensitive land uses (Garvan, residential, childcare centre, school, cattle farming land)

- away from appropriate services and infrastructure required to operate a facility of this scale and type
- away from the area it will be servicing—i.e. requires unacceptable level of heavy truck movements daily to and from the site along roads not built or situated for use of this type.
- The proposal *does not* demonstrate public interest:
 - Any local/regional employment or economic stimulation impacts will be negligible due to automation of operation
 - EIS fails to demonstrate that local and regional benefits have been appropriately identified or evaluated
 - The development *cannot* be suitably serviced by essential infrastructure without unreasonable demands on local networks
 - Community and stakeholder consultation has been sub-par and neither accurately reflects nor attempts to address in any meaningful way the significant lack of support/opposition to the proposal (as evidenced by number of objections, almost 5,000 signatories to a change-org petition, lack of support by local community groups (e.g. WinZero) or Wingecarribee Shire Council, lack of support by Local Member of Parliament Wendy Tuckerman)
 - NSW Government support of a plastics recycling facility within the Parkes Special Enterprise Zone demonstrates a facility of this kind is already supported and suitably located elsewhere within NSW.

Proponent corporate history

The EIS provides scant information about the proponent, Plasrefine Recycling Pty Ltd

The proponent has been largely absent from the pre-EIS and EIS exhibition consultation phases, except for attending a few recent information sessions

- The Australian Government expects all entities operating in Australia to maintain the highest standards of corporate behaviour, irrespective of whether those entities are Australian or foreign owned.
- Persons involved in operating these entities are expected to understand Australia's regulatory environment and abide by all relevant requirements, including corporate governance principles, directors' obligations, market activities, compliance and reporting obligations.
- The Plasrefine Pty Ltd website does not provide evidence of the above considerations, e.g. governance, previous annual reports. Information about the proponent as a company and individuals is perfunctory.
- Plasrefine Recycling Pty Ltd was registered in Australia in 2020 specifically for this proposal.
- By the director's own admission, she has no experience in plastic recycling, neither does the Chief Technical Operator noted in the scope [REDACTED].
- In a recent engagement session (held March 2022) the Director of Plasrefine [REDACTED] admitted that she and [REDACTED] only visited recycling facilities in China, this is their only experience of the industry. This lack of experience does not inspire confidence in the company's ability to navigate the myriad complexities and difficulties of an operation of this scale and nature on the selected site.
- Noting that the proposal requires an Environmental Protection Licence (EPL) to be obtained, and that the Environmental Protection Authority will need to take into consideration when assessing the proponent's application for such a licence whether the applicant is considered to be a fit and proper person (including in particular those matters under section 83 of the Protection of the Environment Operations Act 1997), there is no evidence to indicate that the proponent will be able to satisfy this test and will be successful in securing an EPL.
- Finally, we note a similar enterprise has recently been announced in Parkes by the NSW Government. US-based recycling company Brightmark is investing \$260 million to build the recycling plant in Parkes with capacity to recycle 200,000 tonnes of plastic per year—

making it among the largest in the world. It will use advanced technology and be situated within the Parkes Special Activation Precinct in the state's central west.

- In contrast, this proposal is for an operation of similar size and scale (i.e. 120,000 tonnes at full production per year and therefore, like Parkes, among the largest in the world) but to be delivered by an untested, newly established company with little to no staff, corporate history or relevant experience.

Owners' consent

Lack of owners' consent for access road to and from the site

- This proposal provides that a new access road be provided that extends from the plastics recycling and reprocessing facility site to Lackey Road via the currently unformed Braddon Road (paper road), traversing Lot 1 DP 26490 (77 Beaconsfield Road) and Lot 10 1084421 (owned and occupied by the Garvan Institute of Medical Research).
- Prior to the lodgement of the development application, the consent of the owners of these properties was not obtained.
- As of the date of this submission, it is understood that the proponent has still not secured the consent of the owners of all land to which the development application relates.
- A development application "relates" to any land on which development particularised in the application is to take place (*Al Maha Pty Ltd v Huajun Investments Pty Ltd* [2018] NSWCA 245 at [9]). The above-mentioned properties (77 Beaconsfield Road and the land owned by the Garvan Institute) is referred to in the EIS on multiple occasions leaving no doubt that this land is a critical component to the proponent's development application.
- By way of example, we refer to Parts 1.2.1 and 2.1.3 in addition to Figures 4.1, 4.2 and 4.3 of the 'Main EIS' which indicate that the proposal seeks to develop an access road over 77 Beaconsfield Road.
- We also refer to Part 1.2.1 of 'Technical Report 6' (Traffic and Transport) which states:

*"The new access road which would extend from the plastics recycling and reprocessing facility to Lackey Road via:
- the currently unformed Braddon Road
- Lot 1 DP 26490 and Lot 10 DP 1084421 (the 'Braddon Road east extension')."*
- Part 1.2.2 of *Technical Report 6* further states that a "key feature" of the proposal is a new access road from the plastics recycling and reprocessing facility to Lackey Road via part of Braddon Road.
- Obtaining the consent of *all landowners* to which the development application relates is a prerequisite requirement to the lodgement of a development application.
- Although recent amendments to the *Environmental Planning and Assessment Regulation 2021* no longer require written owner's consent, the requirement for such a consent to be obtained has not gone away as far as we are aware.
- It is unclear how in these circumstances, where the consent of all landowners was not obtained by the proponent before lodgement, that the application was able to progress.
- Importantly, the requirement for the consent of all landowners to be obtained before the consent authority has the jurisdiction to determine the application remains, otherwise the result is invalidity of any consent given.
- Any decision to grant consent to a development application with such deficiencies would be *legally unreasonable* by virtue of it lacking in certainty and finality (this is particularly so in circumstances where the access arrangement to the subject site is dependent on the development of these properties being undertaken).

Unsuitable site and location

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| The proponent has stated that this site was selected mainly due to the fact the land was for sale and affordable. | <ul style="list-style-type: none">- Neither the EIS nor the proponent has adequately explained how or why this site was selected as suitable for a plastics recycling facility of this scale, other than that it was available land at the right price and situated within the Moss Vale Enterprise Corridor (MVEC).- There is no supporting evidence that an operation of this size and scale in this location provides a good outcome for waste recycling or is in the public interest. |
| EIS states that this site is suitable due to being zoned for industrial use and its proximity to transport infrastructure | <ul style="list-style-type: none">- If due diligence had been conducted early in the scoping process, it would have been apparent that other land parcels in Moss Vale (i.e. within MVEC) would have been more suitable for a proposal of this size and scale.- It appears this site was purchased based on affordability and availability rather than suitability.- Just because a site is zoned industrial use, it does not follow that any type of industrial use is appropriate or desirable for that site, as is clearly the case here. |

Traffic and Access

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| The requirement to adequately assess impacts on the existing local road network are not met by the documents submitted. | <ul style="list-style-type: none">- The SEARS clearly identifies that works beyond the development site boundary required to allow the development to proceed are to be identified. This has not occurred.- We are not satisfied that the proponent has provided sufficient evidence for the consent authority to conclude that the proposed development would not have an unacceptable impact on both the natural and built environments in the vicinity of the site by way of:<ul style="list-style-type: none">→ the operation and management of the proposed development;→ the safe movement of the numerous large vehicles to and from the site. |
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Water and wastewater

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| Lack of detail provided + lack of understanding of site | <ul style="list-style-type: none">- The EIS provides an estimate of the required volume of potable water for the operations at the site.- A limited rainwater retention system is shown which equates to three days operational supply. During extended dry periods, all water will need to come from the main potable water supply. A scenario exists where the rainwater tanks are never filled due to water draw off.- A calculation needs to be provided showing the volume of water collected over a year and how the tanks are contributing beyond a token gesture.- The EIS does not provide detail on the waste treatment plant and water balance to sewer e.g. treatment plant appears to be a filter only; no indication of a biological treatment to remove nutrients, organic compounds and bacteria/pathogens likely to generate odorous recycled water. Is the recycled water from the plant fit for purpose/does it meet relevant guidelines?- Sludge: water residue and sludge is greater than 15% of inputs. Is there landfill capacity for this sludge and residue? What is the chemical composition of the sludge and dry solids content? Does this sludge contain hazardous waste material and therefore not acceptable for standard landfill?- What category of trade waste guidelines is the proposed facility? Can the proponent provide the chemical composition of water quality to be discharged to sewer?- What water quality monitoring regime will be imposed on the facility to monitor compliance with trade waste limits?- Can proponent confirm that wastewater does not contain prohibited substances e.g. POPs (Persistent Organic Pollutants), PFAS etc.?- The EIS relies heavily on desktop analysis with very high assumptions versus the provision of actual data required prior to providing actual approvals eg no odour model, |
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associated with the recycled water. Reference : Protection and Biodiversity Conservation Act 1999 : 4.3 5.11

- Can GHD/proponent advise of any test work/trials to demonstrate waste water quality e.g. given residential recycling bins can be contaminated with a range of wastes, pesticides prohibited under NSW trade waste guidelines. EIS trade waste assessment does not address this aspect of trade waste and assumes that it will be standard waste versus a more likely high-risk category (category C) requiring more attention. (Noting acceptance that some industrial waste discharges may require modifications to sewage treatment works or transportation system and related ministerial approvals under Section 60 of the Local Government Act.)
- Independent Industry Assessment indicates a sewage treatment plant with capacity for 10,000 people will produce less than 1,000 tonnes of residue a year for transport to end use or disposal. On this basis, the EIS indicates the Plasrefine facility would produce more waste/sludge than the Moss Vale Sewage Treatment Plant. (Reference Item 6 and 21 WATER Meeting Minutes response to questions.)
- Water Balance: The EIS indicates that Plasrefine would require 46 kilolitres of water per day from an external water source while discharging less than 20 kilolitres per day. On these figures, there is a 20 kilolitres per day discrepancy suggesting a discharge of greater than 20 kilolitres per day requiring a Category C High Risk Trade Waste Discharge.
- Water Source and Usage (In reference to quote from GHD Minutes, Item 21 under Water): "About 46.3 kilolitres per day of water would be sourced from a combination of rainwater harvesting and potable water supply connection to the mains. Approximately 80% of the site water needs can be captured from rainwater captured on site." This does not account for predicted increased frequency of drought associated with climate change and assumes dependency on the Moss Vale potable water supply. Note: there are three water storage tanks on the proposal with a total capacity of 150 kilolitres which is just over three days' supply.
- Trade Waste Guidelines: Can GHD provide details as to how they have determined that wastewater from the Plasrefine operation meets Trade Waste requirement for discharges to sewer for contaminants e.g. evidence of independent test work (GHD Minutes, Item 21 under Water).
- Risk Assessment: Can GHD provide evidence of and the basis for how they scored risk? Can GHD verify that the Risk Assessment has been undertaken by an independent entity and on a quantitative versus qualitative assessment/analysis?

Topographical suitability

EIS provides little to no analysis of the topographical difficulties this site will present to constructing and operating a plant of this size and footprint

EIS is lacking in detail, rigour and demonstrates a concerning lack of familiarity with the site

- With no detailed site surveys included in the EIS, it is difficult to understand how the proposal will navigate the difficulties of this site without causing significant and ongoing impacts on surrounding land uses, e.g. how proponent safeguard Garvan site from possible truck impaction should a truck leave the road?
- No cut and fill plan.
- No engineering drawings. Beaconsfield Road (686 to 679) to Garvan site is a 7m drop and will require engineered retaining wall drawings and safety measures.
- As noted in the EIS, the site is undulating; however, this is not the impression that the supplied drawings give, with the assessment providing little more than perfunctory measurements which are misleading at best.
- Only available contours are in section 2 of main document (2.1-2.10).
- Contours indicate that no safe access to Beaconsfield Road on to Braddon is possible, yet this was mooted at the online engagement session which was held by GHD on Tuesday 8 March 2022.
- Natural ground level on the contour plans is 682ahd at Braddon Road and drops to 676ahd at building 2 (smaller southern building) with no detail as to how this will be retained and/or how stormwater will be managed. Again, no detailed plans have been supplied.

- There is a 4m RL deviation between building 1 and 2, but again no engineering detail is provided.
- Building 2 measurements are given as 72m x 118m; however, EIS drawings have not included the workshop or office, which would give a total length of 136m x 72m, not 118 x 72m. Height is 12m + 4.5m, given the contour of the land.
- No detail has been provided as to how this will be retained and afforded protection from stormwater?
- New access road from Beaconsfield Rd to Lackey is 686m to 662m = 24m fall in the topography of the land but no stormwater management or detailed design engineering is supplied.
- Lackey road has a 5m elevation increase to the north when leaving the Garvan driveway (hill) failing to provide adequate line of sight for vehicles entering or leaving the site.
- Lack of suitable drawings showing the buildings situated with the available contour or cut and fill is not at a standard expected for an EIS process.

Visual Impact Assessment

EIS provides little to no detail or assessment of visual impacts

- The visual impact assessment that has been provided in support of the proposal is completely inadequate in identifying and assessing the impact on existing views from surrounding and nearby development. (See also notes in this objection regarding social impact assessment.)
- Technical Report 7 (Landscape and Visual) fails to adequately assess the acceptability of the impact of a proposal on the views enjoyed from all impacted private properties ('i.e. the nearby private receivers') in the vicinity of the facility.
- This means the well-established planning principle for considering the acceptability of the impact of a proposed development on the views enjoyed from private properties in the vicinity of the proposed development *has not been addressed* (per Tenacity Consulting v Warringah [2004] NSWLEC 140; (2004) 134 LGERA 23).
- Similarly, the visual impact assessment fails to satisfactorily address the acceptability of the impact of the private development on all views from the public domain in the vicinity of the development ('i.e. the nearby public receivers') in accordance with the planning principle established by the Court in Rose Bay Marina Pty Limited v Woollahra Municipal Council and anor [2013] NSWLEC 1046, which sets out the steps to be followed to properly identify and analyse the impacts.
- It is highly questionable that only a very minimal number of photomontages have been included in the visual impact assessment and absolutely none of these show the visual impact that will be experienced by multiple nearby private receivers.
- As far as we are aware, based on our enquiries, the proponent/GHD made no effort to obtain access to the private residences of any such nearby (affected) private receivers and there is no explanation for this provided in the EIS.
- Despite it being an *express requirement of the SEARs*, the EIS does not address the visual impacts associated with the proposed lighting that will be required or generated by the development. This means there is insufficient information available to enable the consent authority to be satisfied that there will be no adverse impact on the amenity of residences in the vicinity of the subject site due to lighting/illumination of the facility itself and generated by the countless trucks constantly accessing and existing in the morning and afternoon.

We refer to *Technical Report 7 (Landscape and Visual Impact)*, which specifically states on page 2 "This assessment does not include landscape and visual impacts from lighting and any possible visual impacts from lighting or light spill are excluded from this assessment, and with the exception of suggested mitigation measures outlined in section 8, external lighting has not been assessed."

- An incredibly limited number of viewpoints were used to assess the visual impact of the proposed facility, particularly given the multiple residences to be affected. Overall, the Technical Report 7 appears to be very carefully curated to avoid accurately and

transparently addressing the full extent of the visual impacts that will result from the development.

- The visual impact assessment also fails to identify the impact on existing views from surrounding and nearby development without addressing directly or even indirectly addressing the well-established and important Land and Environment Court Planning Principles relating to the assessment of visual impacts and how this should be done.
- The proposed mitigation measures, which rely totally on vegetative screening, are inadequate and unreliable.

Consistent with the Court's findings in *Sturt v Shoalhaven City Council* [2021] NSWLEC 1698 at [90] we submit that the consent authority cannot be "...persuaded that it is appropriate to allocate definitive weight to the mitigation effect of the existing screen trees and revegetation on the adverse visual impact of the proposed development" in circumstances where "...the vegetative screening is critical to a conclusion of compatibility and acceptability of the proposed development.

The existing trees are a natural element, subject to the frailty of weather, disease and bushfire risk. It is this uncertainty that is the relevance of the Courts Planning Principle: *Super Studio v Waverley* [2004] NSWLEC 91 at [6]."

Noise impacts

EIS provides little to no detail or assessment of noise impacts

- The proposal will change the noise environment for residents and visitors of the surrounding residential properties and businesses.
- Disturbingly, *Part 5 of Technical Report 2 (Noise and Vibration)* states that "The design of the facility is still in an early stage of development and as such, noise modelling has been based on information provided thus far. As further detail is provided, the operational noise model should be updated to account for potential changes in the design or operating conditions to ensure compliance with the noise limits can be met at all sensitive receiver locations."
- There can be no doubt that there is insufficient information before the consent authority to know and assess the full extent and acceptability of the noise impacts associated with the facility's operations. Consideration of these impacts cannot be deferred to a later stage post determination of the application.

We refer to *Table 4.2 on page 37 of Technical Report 2 (Noise and Vibration)* which indicates that the project's amenity noise level will exceed the "intrusive noise level" during the day for all rural residential receivers. There is information provided which supports the acceptability of this exceedance.

- Concerningly, in respect of the sleep disturbance impacts discussed at *Part 4.1.8 of Technical Report 2*, there is no certainty provided as to whether the project can and will ensure the screening criteria will be met.

Instead, the report simply and indifferently states that "should maximum noise level events during operation exceed the screening criteria, a detailed maximum noise assessment should be undertaken.

- This offers no certainty in relation to the full extent of the noise impacts and whether these can be effectively and satisfactorily managed.
- There is no noise management plan before the consent authority that could give it any confidence that shut down procedures or alike might be implemented should the noise levels exceed whatever levels are ultimately deemed to be satisfactory.
- Regardless of whether the proposal can meet the recommended amenity noise levels for each of the relevant categories of residential receivers, it still remains the case that the proposal will negatively impact on the receiving residents' acoustic amenity as the impact of an 'intrusive noise' is directly dependent on the environment in which it is being experienced.
- Consideration must be given to the fact that the background noise level for all rural residential receivers is significantly lower than the "minimum assumed rating background levels" in the Noise Policy for Industry.

As a direct result of this, noise levels from the facility will have a greater propensity to “emerge” from the background noise level than if the measured background noise levels were actually the minimum assumed rating background levels. Therefore, the presence of the existing very low background noise level in combination with the predicted noise levels (which are not even certain as noted above) will likely cause an unacceptable noise impact for nearby residents. It is submitted that the proposed facility’s noise emissions constitute an “offensive noise” as defined in the Protection of the Environment Operations Act 1997:

“offensive noise means noise—

(a) that, by reason of its level, nature, character or quality, or the time at which it is made, or any other circumstances—

(i) is harmful to (or is likely to be harmful to) a person who is outside the premises from which it is emitted, or

(ii) interferes unreasonably with (or is likely to interfere unreasonably with) the comfort or repose of a person who is outside the premises from which it is emitted, or

(b) that is of a level, nature, character or quality prescribed by the regulations or that is made at a time, or in other circumstances, prescribed by the regulations.”

- Another key factor that will exacerbate the impact of the facility’s noise impacts on residents, is that the noise emitted will be a noise source that is new and heard by residents for the first time.

Furthermore, most (if not all) of the residents who will hear the facility’s operations are not in favour of the facility which also adds to the impact felt.

- The combination of all the above-mentioned factors means residents will be *adversely affected acoustically*. These impacts contribute to adverse social impacts that will be suffered by the local community.

Air quality and odour impacts

EIS fails to demonstrate it has adequately considered, understood or addressed issues related to air quality and odour because of the proposal

- We hold considerable concerns in relation to the odour impacts that will be generated from the site’s proposed operations.
- If the proposal is approved, the community holds no confidence that the facility will be appropriately managed and that the odours emitted will be monitored/addressed.
- The effectiveness and reliability of the vaguely referenced ‘emissions control systems’ referred to in Technical Report 3 (Air Quality and Odour) is questionable.
- We urge the consent authority to read papers and articles such as the following which reveal the significant odour that results from plastic recycling facilities:

→ *‘Evaluating the Effects of Air Pollution from a Plastic Recycling Facility on the Health of Nearby Residents’ by Zhao Xin, Toshihide Tsuda and Hiroyuki Doi dated June 2017, published by National Library of Medicine (National Center for Biotechnology Information) <<https://pubmed.ncbi.nlm.nih.gov/28655940/>>*

See the following extracts:

“Abstract

We evaluated how exposure to airborne volatile organic compounds emitted from a plastic recycling facility affected nearby residents, in a cross-sectional study. Individuals >10 years old were randomly sampled from 50 households at five sites and given questionnaires to complete. We categorized the subjects by distance from the recycling facility and used this as a proxy measure for pollutant exposure. We sought to improve on a preceding study by generating new findings, improving methods for questionnaire distribution and collection, and refining site selection. We calculated the odds of residents living 500 or 900 m away from the facility reporting mucocutaneous and respiratory symptoms using a reference group of residents 2,800 m away. Self-reported nasal congestion (odds ratio=3.0, 95% confidence interval=1.02-8.8), eczema (5.1, 1.1-22.9), and sore throat (3.9, 1.1-14.1) were significantly higher among

residents 500 m from the facility. Those 900 m away were also considerably more likely to report experiencing eczema (4.6, 1.4-14.9). Air pollution was found responsible for significantly increased reports of mucocutaneous and respiratory symptoms among nearby residents. Our findings confirm the effects of pollutants emitted from recycling facilities on residents' health and clarify that study design differences did not affect the results.”

- “*The pollution characteristics of odor, volatile organochlorinated compounds and polycyclic aromatic hydrocarbons emitted from plastic waste recycling plants*’ by Chung-Jung Tsai, Mei-Lien Chen, Keng-Fu Chang, Fu-Chang and I-Feng Mao dated February 2009, published by National Library of Medicine (National Center for Biotechnology Information)
<https://pubmed.ncbi.nlm.nih.gov/19091382/>>

See the following extracts:

“Plastic waste treatment trends toward recycling in many countries; however, the melting process in the facilities which adopt material recycling method for treating plastic waste may emit toxicants and cause sensory annoyance. The objectives of this study were to analyze the pollution characteristics of the emissions from the plastic waste recycling plants, particularly in harmful volatile organochlorinated compounds, polycyclic aromatic hydrocarbons (PAHs), odor levels and critical odorants. Ten large recycling plants were selected for analysis of odor concentration (OC), volatile organic compounds (VOCs) and PAHs inside and outside the plants using olfactometry, gas chromatography-mass spectrometry and high performance liquid chromatography-fluorescence detector, respectively. The olfactometric results showed that the melting processes used for treating polyethylene/polypropylene (PE/PP) and polyvinyl chloride (PVC) plastic waste significantly produced malodor, and the odor levels at downwind boundaries were 100-229 OC, which all exceeded Taiwan's EPA standard of 50 OC. Toluene, ethylbenzene, 4-methyl-2-pentanone, methyl methacrylate and acrolein accounted for most odors compared to numerous VOCs. Sixteen organochlorinated compounds were measured in the ambient air emitted from the PVC plastic waste recycling plant and total concentrations were 245-553 microg m⁻³; most were vinyl chloride, chloroform and trichloroethylene. Concentrations of PAHs inside the PE/PP plant were 8.97-252.16 ng m⁻³, in which the maximum level were 20-fold higher than the levels detected from boundaries. Most of these recycling plants simply used filter to treat the melting fumes, and this could not efficiently eliminate the gaseous compounds and malodor. Improved exhaust air pollution control were strongly recommended in these industries.”

- ‘*The odour of burning wakes us*’:inside the Philippines’ Plastic City’ by Carmela Fonbuena, dated 8 July 2019 , published by The Guardian, <<https://www.theguardian.com/global-development/2019/jul/08/waste-recycling-smell-pollution-philippines-plastic-city>>

See the following extracts:

“Two months after environmental officers visited Cunumay West, residents are still suffering from the pungent smell.“The odour is repulsive,” says Benjamin Lopez, 50. “It woke us up at 2am one time. I had to spray perfume in the room. Others had taken to spreading Vicks VapoRub under their noses.” Residents believe the smell is responsible for five-year-old girl Shantal Marcaida contracting pneumonia, which led to her hospitalisation.

- ‘*Bowral waste facility fined by EPA for poor management practices*’, dated 23 June 2021 published by the NSW Environmental Protection Authority <<https://www.epa.nsw.gov.au/news/media-releases/2021/epamedia210623-bowral-waste-facility-fined-by-epa-for-poor-management-practices>>

See the following extracts:

“Residents living near the Kiama Street waste centre in Bowral have complained to the EPA about offensive ‘rotten egg’ odours since late May this year. During the most recent inspection on 18 June 2021 EPA officers also detected the odours.

“During the inspection EPA officers observed a large area of uncovered waste at the southwestern corner of the landfill,” EPA Executive Director Steve Beaman said.

“The company’s licence requires exposed waste to be covered at the end of each day. This requirement reduces the chance that odours can escape offsite and impact nearby homes and businesses.

“The EPA expects all licensees to comply with the requirements of their environment protection licence and make sure their operations do not impact on the community.”

Inconsistency with objectives of the IN1 General Industrial Zone

Inconsistent with local planning and LEP

- In accordance with section 2.3(2) of the Wingecarribee LEP, the consent authority must have regard to the objectives for development in a zone when determining a development application in respect of land within the zone.
- The proposal should be refused as it is inconsistent with the following objectives of the IN1 General Industrial zone:
 - *To minimise any adverse effect of industry on other land uses.”*
 - *To ensure that new development and land uses incorporate measures that take account of their spatial context and mitigate any potential impacts on neighbourhood amenity and character, or the efficient operation of the local or regional road system.*
 - *To encourage employment opportunities.”*
- The proposal, due to its nature, scale and intensity, is unable to effectively minimise the adverse impacts that it will impose on the surrounding residential land uses. As a result the proposal does not minimise the adverse effect of industry on the surrounding land uses.
- Whilst it is understood that when considering consistency with the zone’s objectives, it is not necessary to show that the proposed development is compatible with the objectives for the proposal to be considered “generally consistent” with the objectives, this is only so long as the proposal is not antipathetic to them (per Schaffer Corporation v Hawkesbury City Council (1992) 77 LGRA 21).
- We submit that there is sufficient evidence available to demonstrate that the proposal is *antipathetic to the above-mentioned objective taking into account the adverse impacts and concerns raised in this submission.*

Social impacts and amenity

The EIS misleadingly (and inconsistent with information provided in the multiple technical reports provided) states in its conclusion that while the proposal has ‘*the potential to result in minor increases in traffic, noise, air quality and amenity impacts, it is a suitable development for the site*’.

It is submitted that this statement is incorrect and that the proposal will have major, adverse and irreversible traffic, noise, air and amenity impacts rendering the site unsuitable given the nature, scale and intensity of development proposed. As such, it is not in the public interest.

- As noted previously, the SEARs for this proposal did not require the proponent to undertake a Social Impact Assessment for the proposal.
- The SEARs did, however, provide very specific instructions around the level and type of community and stakeholder engagement required to support development of the proposal and the EIS.
- The community and Wingecarribee Shire Council have repeatedly requested that the proponent/GHD conduct an adequate assessment of the social impacts of a proposal of this size and scale, preferably via a social impact assessment process or via an enhanced engagement program.
- This request was denied and GHD representatives stated in its online engagement session of 8 March 2022 that it believed Section 18.2 (Socio-economic) of the EIS document adequately canvassed potential socio-economic impacts.
This submission/objection categorically refutes this assessment.
- Section 18.2 of the EIS provides a rudimentary overview of Moss Vale, its location and population, a very high-level demographic profile, and a summary of socio-economic impacts (both negative and positive) of construction and operation.
- It notes that long-term positive impacts are ‘generally more likely to be regional’ (with little detail of what those positive impacts might be beyond, ‘provision of goods and services of nearby businesses to support the operation of the proposal, such as kitchen supplies and office goods...’ and indirect benefit of plant employees ‘spending their wages’).
- On the subject of community perception, and with a notable lack of attention to specifics, this section also states that, ‘public perception... may include uncertainty and concerns regarding the nature of the proposal and its potential impact’, and that, ‘consultation undertaken for the EIS indicated that the vast majority of local residents and community members support local plastics recycling, but were uncertain about the proposal’s potential impacts and benefits as there are limited facilities with similar operations currently in Australia’.
- Section 18.2 is problematic for many reasons:
 - Its analysis of the community and the people living close to or nearby the proposed site is undeveloped and demonstrates a lack of respect or understanding of the concerns of sensitive receivers and others living close to or adjacent to the site
 - Many sensitive receivers—including landowners adjacent to the site—have never been approached or spoken to by GHD/proponent and therefore have been unable to provide input to social, amenity or economic impacts of the proposal for the purposes of this EIS.
 - It makes sweeping generalisations about community perceptions with no attempt to explore or address them in any meaningful way.
 - Disregards the content or intent of feedback provided during the EIS-preparation phase.
 - Is disingenuous in its assertion that consultation indicates ‘most people support local plastics recycling’ but are uncertain about the benefits and impacts of this proposal.

Many people do support recycling in principle, but not on the proposed site. And the community has demonstrated time and again that it is very aware of the impacts of this proposal on that site, despite this EIS’ reluctance to interrogate these impacts with the community and stakeholders in any meaningful way.
 - Does not demonstrate that community or stakeholder concerns have been adequately sought, canvassed, understood or addressed.

- The NSW Government's Social Impact Assessment Guidelines clearly set out how social impacts should be identified, evaluated, responded to and, if appropriate, monitored and managed. It also notes that a SIA is not a 'one-size-fits-all' approach. Noting that it is compulsory for all SSD applications to now be accompanied by a Social Impact Assessment (as of October 2021) due to the Department's recognition that this is critical to identifying, predicting and evaluating the likely social impacts of a proposal, *it is unacceptable that no such assessment has been carried out having regard to the significant scale and nature of the proposal.*
- With some small exceptions, Section 18.2 could have been taken from any report about any regional community. It is generic and contains no real analysis or understanding of the specific nature, context or impact of this proposal on this community, or their specific concerns and repeated requests for meaningful information and detail about the proposal.
- The EIS' lack of detail and rigour reflects poorly on the proponent's genuine willingness to understand, consider and address the community's concerns and demonstrates little respect for the community, surrounding landowners, nearby residents and businesses, the local school and childcare centre, or the very real safety issues associated with construction and operation of a proposal of this scale and impact.
- *This provides the community with no confidence that our concerns or perspectives have been listened to or considered. This is evidenced by the nature of the proposal and its numerous unacceptable impacts.*

- Without an adequate, respectful and meaningful engagement or Social Impact Assessment process, the proponent cannot enjoy the trust of the community. Without trust, the proponent can have no social license to operate within the community and there is no acceptance of the project by most community and stakeholders.
- It is submitted, and noting that there is an absence of any evidence from the proponent demonstrating anything to the contrary and based on our own independent social engagement activities, *that the proposal will have a variety of negative social impacts that have a high-extreme risk rating that cannot be mitigated or managed.*
- The lack of quality of the EIS demonstrates that the proponent/GHD have no interest in understanding the full extent of these impacts and have instead simply focused on promoting purported and unsubstantiated 'benefits', meaning that there has been no efforts made to address in a tangible way the serious concerns of the community (e.g. in relation to the traffic, visual, noise, odour, air quality and other environmental and amenity related impacts).
- Where the very purpose of a Social Impact Assessment is to identify, evaluate and weigh both the positive social impacts as well as the negative social impacts, and no such assessment has been undertaken, this suggests that it is likely the proponent is aware that any positive benefits of the proposal are far outweighed by the significant negative impacts that will be caused which should, we submit, be sufficient justification for the refusal of the proposal.
- In respect of the EIS's claim that the proposal will generate local employment opportunities, this is highly questionable and there is insufficient information available to support the accuracy of this statement. For example, we note taking into account the increased automation and digitisation of the waste industry this may in fact have labour displacing effects.

Furthermore, the proponent has made public statements indicating that specialised staff from overseas would be employed to operate the facility. Regardless of any moderate positive social impact that the proposal may (but will likely not) have on the local economy, it remains the case that the significance of any such impacts would be countered by the negative social impacts.

- For example, there are serious concerns held for the tourism industry in the Southern Highlands because of the proposal in circumstances where the scenic nature of Moss Vale and surrounding townships and villages is at the heart of many businesses and why people choose to live in these areas.

It follows that any such activity that tarnishes the scenic nature of the area poses a threat to the livelihoods of residents and businesses alike.

- The significant safety issues (both vehicular and health) posed by increased truck and traffic movements in and around the site are of sincere and significant concern to the community—particularly as the EIS and consultation process has been muddled and contradictory on the question of traffic and road access.
- That these have not been considered in any serious or sensible way by the EIS and consultation process again reflects poorly on the intent and judgement of both the proponent and the consultants engaged to prepare the EIS.

Construction

EIS provides no real detail about construction (and therefore impacts) and how the building will/can house equipment of a scale and complexity necessary to deliver such an ambitious project

- The lack of detail provided does not allow an assessment of the environmental impacts of the entire construction required to establish a facility at this site.
- GHD have repeatedly stated that the detail would be provided after a consent was granted. They are missing the point about the requirement to assess all the works BEFORE any consent could be granted.

Operational concerns

Waste arriving, product leaving and waste leaving

- The EIS claims that the number of vehicle movements have been reduced from the initial proposal, as a result of community input.
- The main change has been to move to 20 tonne trucks - they have also shown a semi-trailer as the largest vehicle to access the site and the two facility buildings. This does not tally with a 20-tonne load of plastic waste.
- The figures also do not include for product leaving the site - whether it is flakes or pellets, or finished product.
- There will be items that cannot be recycled, together with captured waste from the washing process. This needs to be clearly quantified and details of the destination identified and to include vehicle routes/truck sizes etc.

Vehicles accessing the buildings

- Fast action roller doors are identified in the submission (we note that for accuracy, these should be referred to as fast action panel doors) and vehicles are to enter the building and the doors immediately close behind them to prevent loose plastics escaping. The doors are identified as also helping to prevent noise escaping from the building.
- Details for the acoustic panel lifts doors are not provided. A more developed design would use an appropriate trap arrangement where the product is delivered into a holding area with doors. The connecting doors to the processing area could then be opened at an appropriate time to ensure the noise from operations is not encountered each time a truck enters or leaves the premises.
- We have been advised by GHD that the noise level inside the operations area is predicted to be 85dBa. There is no control over the timing of deliveries over the proposed 11-hour period for trucks entering and leaving the site, and assurances are not sufficient to accept that these will be staggered. The applicant has requested 24-hour operations for this site - how can noise spill events be detected, quickly addressed and mitigated?
- The two buildings are shown at RL 672 and RL 676 - with swept paths showing access for the semi-trailer to both. From simple analysis it is difficult to accept that this can be made workable - vertical curves and clearances would need to be checked. Again, no real details for this have been provided.

Greenhouse gas assessment

- The EIS states that a key objective of the proposal is to align with NSW Government policy around waste and recycling
- The NSW Government's Climate Change Policy Framework sets clear objectives to halve greenhouse gas emissions by 2030 and achieve net zero emissions by 2050.
 - The *EIS Technical Report 9: Greenhouse Gas Assessment* fails to acknowledge the NSW Government's policy context on climate change and therefore fails to assess the project's alignment with government targets and objectives for greenhouse gas emissions.
 - It is not appropriate for the greenhouse gas assessment to exclude scope 3 emissions, particularly from the following emissions-intensive sources:
 - the embodied energy of construction materials, particularly concrete, steel and asphalt/bitumen, which are high in embodied carbon
 - the transport of construction materials and waste to and from site, which is likely to be significant.
 - While it is acknowledged that specifics are difficult to obtain during a project's planning process, there are various methods available to estimate such quantities and calculate the associated emissions (for example, the publicly available resource used by NSW Roads and Maritime Services: Greenhouse Gas Workbook for Road Projects (Transport Authorities Greenhouse Group, 2013) Greenhouse Gas Assessment Workbook for Road Projects).
 - The exclusion of such sources of emissions is likely to grossly underestimate the emissions attributable to the project's construction and it is therefore not appropriate for GHD to state that construction emissions would be negligible on this basis.
 - Exclusion of these sources from the assessment also means GHD fails to identify specific and targeted mitigation measures to reduce GHG emissions during the project's construction. There is no commitment in the EIS to the ongoing monitoring and management of GHG emissions during construction.

Community and stakeholder engagement

- The EIS claims that the approach taken to engagement was based on the proponent and GHD proposing 'a clear and comprehensive approach to engaging with the community and stakeholders' based around the principles of 'regular, two-way communication and active listening'. GHD claims to have worked within the following engagement objectives (p.6-1):
1. build and maintain relationships with the community and stakeholders
 2. ensure that a broad range of local community and stakeholders are informed about the proposal and given the opportunity to provide feedback
 3. provide the community and
- The *Undertaking Engagement Guide: Guidance for State Significant Projects*, published by (then) Department of Planning, Industry and Environment (Department) in December 2020 clearly sets out the expectations of the Department for early and effective engagement on state significant projects, including SSDs.
 - It advocates for 'early and effective' engagement and notes its importance in underpinning a fair and transparent environmental assessment process *where careful consideration of diverse viewpoints* [our emphasis] can help achieve good planning outcomes and avoid negative impacts to communities.
 - It notes that best practice engagement can only be achieved if the engagement strategy is underpinned by principles which reflect best practice, i.e. open and inclusive, easy to access, relevant, timely and meaningful.
 - We submit that the community engagement process conducted by the proponent and GHD to support both the pre-EIS exhibition phase and the EIS public exhibition phase has been woefully and demonstrably inadequate.
 - To demonstrate, our response refers to GHD's failure to address its own engagement objectives:
Build and maintain relationships with the community and stakeholders:
 - GHD has made no genuine or authentic attempt to engage with the community or stakeholders to consider diverse viewpoints or facilitate good planning outcomes for this proposal.
 - This is evidenced by the number of emailed/telephone complaints and objections that have been made to GHD/Plasrefine, the Department, Wingecarribee Shire Council (WSC), Wendy Tuckerman MP, and Anthony Roberts MP to name but a few. There would be little need for people to resort to such lengths if there was any kind of relationship between GHD and the community.

- stakeholders with an opportunity to ask questions and identify areas of concerns re proposal
4. provide direct feedback to the project team during all stages of the proposal and develop solutions to address community expectations, where possible
5. identify and manage issues, effectively and proactively
6. manage stakeholder feedback and complaints in a timely, respectful way
7. satisfy engagement requirements of SEARs
8. monitor and evaluate stakeholder feedback to measure success
- build community and stakeholder confidence in Plasrefine Recycling and the decisions it makes through transparency and ongoing commitment to working in partnership with the community.
- A petition on the Change.Org website has just under 5,000 signatures (4,850 as at 21 March 2022) and the community has clearly articulated its dissatisfaction with both the proposal and the EIS process through this outlet.
 - GHD advised that 27 people in total attended the 6 sessions held in Exeter on 9 and 10 March.
 - The capacity for each session was capped at 25 people (no real explanation was provided as to this limit and the venue being 12km distance from Moss Vale).
 - It is clear that the community has realised that the sessions were a simple tick box for GHD and that answers provided to questions raised were often in contradiction of the EIS with many apparently invented on the spot.

Ensure that a broad range of local community and stakeholders are informed about the proposal and given the opportunity to provide feedback:

- It is difficult to provide feedback on a State Significant Development with such little detail or substance.
 - The lack of community knowledge of, or information about, the proposal led to the establishment of the Moss Vale Matters Facebook page by community members as a means of providing information to the community about the proposal.
 - In many cases this was the first time people had heard of the proposal, including some sensitive receivers who until then (and as recently as January/February 2022) had no knowledge of what was proposed on land adjacent to their own properties (e.g. Adrian and Mary Maggiotto of Elwood Park Beef Cattle Enterprises, who neighbour the proposed site and who are providing their own objection submission).
 - Wingecarribee Shire Council (WSC) recently advised the community (via a community session held on 17 March) that they have asked for an extension of time to provide a response to the EIS, noting that they have been unable to assess all documents within the exhibition period timeframe.
 - GHD has repeatedly claimed to have been in regular contact with WSC during the pre-EIS and EIS exhibition phases of the SSD process, which was countered during a community information session with Council (who noted they had met with GHD three times from pre-EIS to EIS exhibition) and evidenced by Council's request for an extension of time to consider and provide a response to the EIS.
- Had Council been regularly 'informed about the proposal' and given the 'opportunity to provide feedback' there would have been 'no surprises' in the EIS documentation and they would feel informed enough to prepare a response within the exhibition period.
- Similarly, had the community been adequately informed about the proposal, and given meaningful opportunity to provide feedback and ask questions during the EIS preparation, there would have been no need for information about the proposal to have been provided *to* the community *by* the community (via Moss Vale Matters Facebook page, local media, social media), there would have been no need for the community to organise its own letter box drop of 10,000+ flyers (conducted 10-15 March) to advise the community about the proposal and how to make a submission, and there would have been no need for us to organise our own community information session (held on 16 March at Moss Vale Services Club and attended by just over 100 community members) in order to provide information and answer questions (as best we could).

Provide the community and stakeholders with an opportunity to ask questions and identify areas of concerns re proposal:

- It should be noted that many community members asked for an extension of the mandated 28-day exhibition period (23 February to 22 March 2022) to review the EIS documentation lodged by GHD, noting that this was the first time we had seen any meaningful detail of the proposal.
- This was also requested as the exhibition period was punctuated by some of the worst floods on record for NSW, with many areas of Wingecarribee inaccessible and deluged by floodwater in February.

- Despite these difficulties, our request for an extension (made to the Department and also to Wendy Tuckerman MP and Anthony Roberts MP) were not accommodated and we have been compelled to review the EIS documentation, and assess and lodge our objection/submission under extremely difficult circumstances.
- Similarly, requests to GHD to postpone their scheduled EIS Exhibition in-person events (held w/c 7 March) to later in the exhibition period when community members could be better prepared and recovered from flood events, went unheeded. Hard copies of the EIS documentation did not appear in the local library until early March.
- GHD's in-person sessions were held in Exeter, 12kms from Moss Vale. Requests for sessions to be held in Moss Vale (a) at a later date once impacts of floods had reduced, (b) within a reasonable area/radius of the proposed site, and (c) once people had had enough time to read through and digest the many hundreds of pages of the EIS, were refused by GHD.
- When asked why the sessions were being in Exeter, as opposed to Moss Vale, responses ranged over time from there being no suitable venues available in Moss Vale (demonstrably incorrect) to fears people may become intoxicated if the sessions were held in the Moss Vale Services Club (despite multiple pre-EIS sessions being held there without incident).
- Ultimately, we organised our own community information session on 16 March at Moss Vale Services Club, which was attended by over 100 people. Many people had only heard about the proposal due to community-led efforts, including Moss Vale Matters Facebook page, letter-box drop flyers, local media advertising, and word-of-mouth.
- Clearly, if GHD had 'built and maintained relationships with the community', or given us a chance to 'ask questions and identify areas of concern' in a genuine and authentic way throughout the pre-EIS and EIS Exhibition process, we would not have had a situation where so many members of the community were so distressed at such a late stage in the process about a proposal they had heretofore heard nothing about.

Neither would we have had to ask for an extension of time to be able to review the detail of the proposal—mostly for the first time—in the EIS documents and during the exhibition period. We should already have been aware of the key tenets of the proposal.

'Provide direct feedback to the project team during all stages of the proposal', 'develop solutions to address community expectations, where possible, and identify and manage issues, effectively and proactively' and 'manage stakeholder feedback':

- This objective has most clearly not been met. The opportunity to work with GHD or the proponent to co-develop solutions and/or manage issues effectively has not been evidenced at all throughout the entire pre-EIS and EIS exhibition process.
- On the few occasions when GHD has met directly with the community, the format has been about providing very high-level information and expecting the community to either provide on-the-spot feedback or via a community hotline or email, neither of which provides an opportunity for informed discussion or co-developing solutions and better community outcomes over time.
- This does not meet GHD's own objectives and it does not satisfy the Department's criteria for effective and genuine engagement either.
- GHD's approach to engagement has been muddled and lacking in transparency.

During conversations with the community, it was never made clear what could or could not be influenced as part of the engagement process. Rather, some feedback would appear to be actioned (e.g. changing number of truck movements) but no substance provided as to what that might actually look like (e.g. routes, size, capacity, operation). By the next interaction, it would be changed again to something different. Again, with no apparent logic or substance.

- Details of which route would be used to gain access to and from the proposed site were confused at best and obfuscatory at worst.

- Wingecarribee Shire Council has clearly stated that they will not allow Beaconsfield Road to be used to access the site either during construction or operation, yet the EIS states that :

During preparation of the EIS and in consultation with Council, it has been identified that if construction of the new access road is delayed due to land acquisition issues, the proponent would need to use Beaconsfield Road for construction access until the new road is available. During this period, limitations on the number of heavy vehicle movements allowable on Beaconsfield Road would be implemented to ensure compliance with the noise criteria stipulated in the Construction Noise and Vibration Guideline (Transport for NSW 2016).

- The continued lack of clarity and contradictory statements about issues as fundamental as access to and from the site is indicative of the muddled and rushed nature of the EIS process and documents submitted.

Satisfy engagement requirements of the SEARs

- While in principle most people support initiatives that help reduce emissions, increase recycling and help achieve net zero aims, this proposal does not have community support or buy-in because it is, quite simply, not justified or in the public interest given its size and scale, position and noise, transport and access issues, and complete lack of adequate assessment of environmental impacts.
- We have repeatedly asked GHD/proponent to conduct a social impact assessment in order to fully explore impacts to amenity, social connections, safety and other issues with the community in a meaningful way.
- Council too has asked for a social impact assessment, as has, we believe, Wendy Tuckerman MP. GHD has consistently declined to conduct this, stating that it is not a requirement of the SEARs.
- In the absence of a social impact assessment, a meaningful, genuine and authentic engagement process with community and stakeholders becomes doubly justified and important in order to adequately canvas, address and respond to concerns and questions. It is also important for the proponent to understand any limitations of the proposed site and surroundings, and to ensure design and operation considerations are reflected in the EIS.
- Engagement with GHD has consistently been on their own terms, not that of the community. While GHD may cite the volume of interactions with the community as evidence of a functioning engagement process, we would counter that it instead indicates confusion and a desperate need for adequate and meaningful information about the proposal—which we have never received and which is clearly still absent from the EIS documentation submitted.
- As far as managing stakeholder engagement to a standard expected of an EIS process is concerned, separate submissions from relevant and primary stakeholders (e.g. WinZero, Wendy Tuckerman MP, WSC) will also, we are confident, demonstrate that this process was sub-par and not in line with community expectations.
- We recognise that community engagement around SSD proposals cannot always yield all the outcomes a community desires. Nonetheless, transparent and authentic engagement means the community can have confidence in the process, if not the outcome.
- In this case, the community has no such confidence, noting the due diligence lacking in both the engagement process and the resulting EIS documents.

Not in the Public Interest

- The negative impacts of the proposal, including not least the traffic, visual, noise, odour, air quality, water and associated social impacts outweigh any economic and other public benefits that the proposal may offer and which may be secured elsewhere on a more suitable site. The responses from the community are entirely reasonable and despite the deficiencies in the proponent's application, it is still clear that an adverse effect on the amenity of the local area will result from this proposal. The proposal therefore must be refused.

EXHIBITION OF STATE SIGNIFICANT DEVELOPMENT
PROPOSED MOSS VALE PLASTICS RECYCLING FACILITY