



SANDRA BARDEN

OBJECT

Submission ID: 209485

Organisation: N/A	Key issues: <i>Social impacts, Land use compatibility (surrounding land uses), Traffic</i>
Location: 2579 New South Wales	
Attachment: Attached overleaf	

Submission date: 10/27/2024 8:57:21 AM

Objection attached

26 October 2024

Independent Planning Commission
Suite 15.02, 135 King Street
SYDNEY NSW 2000

Dear Sir / Madam,

Subject: Submission as Objection to Moss Vale Plastics Recycling Facility (Plasrefine)
Your Reference Number: SSD-9409987

As a full-time resident of the Southern Highlands I am writing to lodge my strong objection to the proposed Moss Vale Plastics Recycling Facility (Plasrefine). I find it frankly, incomprehensible this application has reached the "Recommended" stage by the NSW Government Department of Planning, Housing and Infrastructure, as per their Development Consent, dated only 2024 (File: EF20/28908).

My background is as a Work Health Safety & Compliance Manager with experience gained over 25 years in high-risk industries including industrial/medical & speciality gas manufacturing (Major Hazard Facility), mining and resources (mineral exploration and drilling) and specialised dangerous goods road transport. These organisations were well established in their respective industries, with an unwavering focus on Governance, safety and compliance.

I understand the recycling of plastics is an issue to be addressed and is both a State and Federal Government focus however, there appears to be an almost wilful denial of decision makers to acknowledge the serious concerns raised regarding this application. I cannot understand the rationale for approving a greenfield site of this size, operational complexity and risk profile to be built at this location, by a proponent / operator with, as I understand, no previous experience in this industry. Clearly the proponent has vast financial resources to draw on to continue this process after Wingecarribee Shire Council initially rejected their proposal. They have accessed every type of consultant available to support their application, via GHDs professional inhouse expertise and their network of consultants. Those of us who have lodged valid objections to this application, and there are many of us, do not have access to chemical engineers, process safety engineers, hydrologists, road safety consultants, legal representation etc., in other words, the assorted pool of paid consultants needed to provide the technical expertise to even up the playing field. It could also be questioned that given Wingecarribee Shire Council was in Administration during this process, has this advantaged the proponent in their application?

The imbalance of power and financial resourcing between the proponent, their paid support group and those of us objecting, is comparable to a modern-day David & Goliath situation. It is quite frankly in my opinion, morally and ethically reprehensible by any measure.

Following are my objections based on reading the EIS and submitted supporting documents, along with the "Recommended Development Consent, 2024"

- 1. Objection Based on Traffic and Access**
 - a) Level Crossings and Heavy Vehicles**

It is a fact that heavy vehicles are involved in level crossing collisions more often than light vehicles. Increased heavy vehicle movements across a level railway crossing exponentially increases the likelihood of a fatality or serious incident. Despite this knowledge and anticipated heavy vehicle movements of 100 per day, this particular site is still being promoted as the ideal location for the plastics recycling facility. Despite trying, I can't establish the daily rail traffic on the Berrima line.

The latest report released by the Australian Transport Safety Bureau (ATSB) in March 2024 found:

- In at least 12 collisions the heavy vehicle driver had regularly used the level crossing prior to the collision with the train.
- In at least 14 collisions, the heavy vehicle driver's view of the track or level crossing protection equipment was obstructed by vegetation, the design of the heavy vehicle cab, poor crossing lighting, or sun glare.
- In at least 14 accidents, it was likely the heavy vehicle driver intentionally entered the level crossing in a manner contrary to road rules, however even in these instances the intention was to proceed through the crossing prior to the arrival of a train

Transport for NSW Level Crossing Improvement Program is upgrading passive level rail crossings to active crossings which include high intensity LED flashing lights, bells, new signage etc. This may well result in additional noise and light pollution for those neighbours close to the proposed facility.

Below Table D.1 is taken from a GHD document responding to a suggestion to add boom gates at the level rail crossing. Relocation of the level crossing as suggested would not necessarily negate the need for a boom gate given Transport for NSW level crossing initiatives.

What we heard	Where addressed in this report
Amended haulage route	
Suggestion to add boom gates at the level rail crossing.	The proposed haulage route includes relocation of the level crossing that would remove the need to add boom gates to the existing level crossing.

I note a stated control measure by GHD is to implement a Heavy Vehicle Driver Code of Conduct. An administrative control such as this is totally meaningless. Without having access to risk assessments on this project, it could be suggested the risk associated with this activity is assessed as Very High and unless the route was changed to entirely exclude site access via a railway level crossing, couldn't be lowered to an acceptable level.

2. Objection Based on Recycling Process GHD Appendix A Updated Proposal

a) A-5-2 Process

Refer Figure A.8 providing a *high-level overview* of the proposed plastics recycling and reprocessing process. I am not a chemical engineer or technical expert on plastic recycling. I have read available information on this process in preparation of my submission. There appears to be a general lack of transparency provided by GHD and the proponent on this process, which is particularly concerning. The entire "theme" of the overall proposal is presented as there being next to no risk profile involved with the operation of the facility or the recycling process. Any objections raised appear to be addressed with yet another new administrative control measure or another consultant's report submitted by GHD with a simplistic solution to counteract opposition.

Based on available information, there is a substantial risk that plastics collected for recycling may have already started to degrade due to moisture exposure, heat and light which then creates further technical challenges for mechanical recycling due to changed chemical composition and potential for VOCs to be emitted as part of the recycling process (Takada, H. and Bell, L. *Plastic Waste Management Hazards*. International Pollutants Elimination Network (IPEN), June 2021). This is just

one example of hazards associated with the recycling process as I understand it but aren't mentioned within the proposal. Clearly the recycling process is complex and presents myriad risks dependent upon the process used. Why is this proposal presented as being basically risk free?

Risks and contamination associated with PFAS chemicals were also initially unknown until more sophisticated analytic testing was developed to detect levels in humans and water i.e., these chemicals were safe until it was discovered they weren't.

b) A-5-7 Process Wastes

GHD state "About 10,000 tonnes per year of residues from the sorting process would require off-site landfill disposal and a further 9,000 tonnes per year of mostly filter cake residue from the on-site wastewater treatment plant would either be converted to product onsite or otherwise disposed at landfill". I would be interested in establishing:

- i. What exactly is the composition of the waste materials, which I understand will be transported to a licenced EPA facility?
- ii. Is the waste material to be treated at a so called "Waste to Energy Facility" to be burned in an incinerator?
- iii. What is the composition of the 9,000 tonnes of dewatered sludge (filter cake) and will it be considered hazardous waste?

3. Objections Based on Hazards & Risk

a) Emergency Response Plan B.62 and B.63

Having previously worked in Major Hazard Facilities based in industrial areas of metropolitan Sydney, I would respectfully question if the required resources to contain and extinguish a fire at a plastics recycling facility exists within fire brigades in the rural southern highlands? GHD state additional emergency personnel can be brought in from Campbelltown and Wollongong to assist in the event of a fire but that's not remotely realistic in an emergency response situation in such a facility. Why are residents expected to accept this from GHD when it is so unrealistic?

The objections I've raised are just a few of my concerns. The platitudes stated by GHD that the proponent wishes to "help" the Government achieve their plastic recycling objectives and be a "good neighbour" are a little difficult to accept. These phrases are nothing but overused corporate speak and are basically insulting to even have to read.

I firmly believe the entire project should be stopped from proceeding any further at the Moss Vale location. Clearly the proponent has very "deep pockets" to maintain the level of engagement he has with his coterie of consultants. Every valid objection based on site location and lack of transparency over the operation is countered with another slick resolution and control measure by GHD to ensure this application is approved i.e. new roads to be acquired and built, railway level crossings to be moved, the proponent previously censured and fined by the Environmental & Ecological Bureau in Beijing for environmental non-compliance in his native China overlooked. Concerns must have been raised as to whether or not Mr Lyu Yalin would pass the Fit & Proper Persons test for this application, so the applicant was changed to being Mr Lyu Yalin's niece. Is there nothing that won't be done and accepted by decision makers to make this happen?

Yours sincerely



Sandra Barden

References:

Hahladakis, J., Velis, C., Weber, R., Iacovidou, E., and Purnell, P. (2018) An overview of chemical additives present in plastics: Migration, release, fate and environmental impact during their use, disposal and recycling. *Journal of Hazardous Materials* 344 (2018) 179–199.

Takada, H. and Bell, L. *Plastic Waste Management Hazards*. International Pollutants Elimination Network (IPEN), June 2021.