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OBJECT

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Organisation: <i>N/A</i>	Key issues: <i>Other issues</i>
Location: <i>Redacted</i>	
Attachment: <i>Attached overleaf</i>	

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Document attached

MOSS VALE PLASTICS RECYCLING FACILITY - SSD- 9409987

Objection

I live in Moss Vale about 2 kilometres (in a straight line) from the proposed Plastics Recycling Facility.

I am deeply disappointed by the Department of Planning's recommendation to approve this project. I am concerned by the project's lack of detail as well as major changes to detail in successive versions of the proposal.

Moss Vale has moved forward over the last 10 years, with new residential developments, population growth and a thriving local business community attracting many visitors to the town and region. I am perplexed by the decision to recommend for approval the hazardous industry Plasrefine represents in a location close to the township, people's homes and businesses. It does not 'fit'.

The proposal also has lots of 'gaps': there are no details of the chemicals intended to be utilised during the 'recycling' process or the number of stacks on the facility. The dangers of noise, dust, emissions and fire in addition to micro/nanoplastics released into our air and waterways (and subsequently Sydney Water) are underplayed despite published evidence to the contrary. The fact that contaminants will find their way into the environment through the facility's design and local weather is ignored. The number of employees at the facility keeps increasing. The facility now has a research section. It will have 'advanced technology' (Ms Nancy Zheng, Day 1 Public Meeting Transcript) but there aren't any details about what this advanced technology will be.

The information from Plasrefine, even on its website, about its proposed operations has been inconsistent from the beginning of the process.

The Southern Highlands is known for its rural character, 'green space' and natural environment and people are attracted to the area, situated on the Sydney to Canberra corridor and move here. The region is home to endangered microbats, platypus and koalas. A hastily planned Plasrefine facility in the wrong location will destroy what we value about our local area.

The Applicant has admitted to having no experience in plastics recycling yet the application is recommended for approval by the Department of Planning. The Applicant does not have the funding to construct and operate this facility, depending upon Government grants as well as loans yet the application has been recommended for approval. I am concerned that a 'near enough is good enough' approach has been taken in the approval process irrespective of the risks that this inappropriately located, hazardous industry represents to the local community.

I lack confidence in the Applicant and her ability to manage this facility despite Ms Zhang declaring that Plasrefine will earn 'social trust' (Day 1 Public Meeting Transcript). There is no evidence that Plasrefine has earned the trust of the community at this point in time.

Our local Member of Parliament the Hon Wendy Tuckerman MP offered to meet with the Applicant to show her more suitable sites in her electorate of Goulburn. There does not appear to be any evidence of a response from the Applicant or an explanation as to why the Applicant would not meet with Ms Tuckerman.

Caution and preventative action should be taken in the face of the uncertain and hazardous risks this facility presents to the community. Things will go wrong. There is nothing to be gained by allowing a giant plastics recycling facility to be located in the middle of a thriving and clean residential and business community. Far worse is what will be lost if a mistake or error in operation occurs. And this regional community will be left to deal with it.

The proposed facility is too close to the Moss Vale township, people's homes and livelihoods. There are new local housing developments in Moss Vale; our local schools are full with waitlists. There are new childcare facilities in the area. There is new investment in the Moss Vale business community with a now thriving main street and the visitor economy is booming. All of this will be under threat should approval proceed as the proposed location is not the right site. The proposal should not be approved.

Social Impact

The Plasrefine proposal has already negatively impacted upon the residents of Moss Vale and the wider community.

Scant information about the project was provided by the letterbox drop on Christmas Eve 2020. On the eve of the Christmas holiday period, there was no where to go for information as our local council as well as state Government departments were closed over the Christmas-New Year period.

The community as a whole was negatively affected by the 'community consultation' session held by GHD on 18 November 2021 at the Moss Vale Services Club. I am a former NSW government public servant, responsible for the community consultations in my areas of responsibility and I have never seen anything like this session.

It became clear very early in the session that GHD staffers did not wish to hear from the community, questions or comments. I believe it was [REDACTED], Business Group Leader GHD who led this session. She told us that our concerns were to be written on sticky post-its and stuck to walls. She would not take any questions. She refused to hear what we wanted to say. When one member of the audience - a former mayor of Wingecarribee Shire - stood to ask a question, a security guard was sent to literally 'stand over' her. I believe this was to bully and intimidate those attending.

The next round of 'community consultation' held in June 2023 at the Moss Vale Community Centre had a similar approach. [REDACTED] stood in front of us at the beginning of the meeting with hands on hips and yelled that she would not 'stand' for any bad behaviour - which I assumed meant that we weren't to talk or ask questions.

Once again we were bullied and treated like [REDACTED] by GHD and Urban Ethos staff present on the day. We were also told the lie that our local member of parliament Wendy Tuckerman MP approved of the project. We left the meeting angry and frustrated.

I note that GHD's website states, 'our people are united by the core values of **safety, teamwork, respect and integrity**. We live with these values to strengthen our relationships with our clients and within the communities in which we operate. They define who we are' (<https://www.ghd.com/en-au/about-ghd/our-values-and-culture>).

I did not see any evidence of respect and integrity in GHD's interactions with this community. There was certainly no professionalism. GHD appeared more concerned in

protecting its client's interests and pushing this project through at any cost. I feel that community concerns about the project were stonewalled.

I note in the transcript of the IPC's meeting with the Applicant (which included GHD staffers) Ms Cavallo informed panel members that as part of the community engagement process, the community had been 'door-knocked' and received letterbox drops as well as email updates. I have never spoken with anyone from GHD who moved from door-to-door. I have never received Plasrefine information in the mail or via email. There has been no evidence of this in my neighbourhood at least. There may have been in [REDACTED] words, a 'sheer amount of engagement' however what is important to note about this 'engagement' is the tone of the engagement sessions I attended which I can only describe as antagonistic on the part of GHD. There is no evidence in the transcript that [REDACTED] described the strategies GHD used to silence community voices.

In the same transcript, [REDACTED] community 'angst and outrage' about the project however claimed that 'trouble' had been 'stirred up' by individuals living 40 kilometres from the site. I do not know the basis of [REDACTED]' claims however I can assure the IPC that this is not true. I live 2 kilometres from the site, not 40. I know of people from across the Wingecarribee Shire, in Sutton Forest, Berrima, New Berrima, Bowral, Fitzroy Falls and Mittagong who are worried about the project. They don't live 40 kilometres away. [REDACTED] also seems to blame the community for the fact that this project is now before the IPC. The Moss Vale and wider community - not people 40 kilometres away - is distressed and moved to act because this proposed facility is to be located in a site that is totally inappropriate.

Contrary to Ms Zhang's claims (Day 1 Public Meeting Transcript) I am not aware of 'numerous relationships' between Plasrefine and my community. There is no evidence of this.

I note that the Department's Assessment document states that the Social Impact Statement (SIA) proposed a range of mitigation measures to allay the (identified) negative social impacts felt by the community including the preparation of a Community Engagement Plan (CEP) and establishing a Community Consultative Committee (CCC) for community members to express concerns and complaints (page iii).

An independent consultant Professor Roberta Ryan from the University of Newcastle reviewed the SIA. She advised that the proposed mitigation measures in the SIA would reduce many of the community's perceived negative impacts. Professor Ryan has expertise to advise on these matters (newcastle.edu.au) especially in relation to stakeholder engagement in 'contested and sensitive matters' however I wonder if she was provided with any context regarding community concerns over this proposal, for example the precise location of the proposed facility. There is no evidence of this.

Professor Ryan has recommended the preparation of a Social Impact Management Plan (SIMP) which would detail measures to engage the community, minimise negative impacts and enhance positive impacts for the life of the development (Page iii).

I question whether this would occur given the interactions of the Applicant, GHD and the community so far. I cannot believe any 'recommended conditions' would be implemented based on current evidence.

I am angry about the way my community has been treated. I have never experienced a community consultation and engagement process where the community has been treated with so much disdain, disregard and aggression as we have been during the life of this proposal.

Plasrefine's impact will be felt across the Southern Highlands and beyond - it is not just a Moss Vale problem. Toxic emissions and microplastics will be released into the air we breathe and our local drinking water, polluting our waterways and subsequently the Sydney Water Catchment Area. It will destroy habitat and our fragile wildlife. Moss Vale and the wider community will suffer from the dust, noise, vibrations, traffic impacts and an inevitable fire hazard from the Plasrefine facility.

The NSW Government cannot in good faith promote this region's visitor economy while at the same time allowing that very economy to be destroyed by a toxic polluting plastics factory close to town.

The social impact Plasrefine represents to Moss Vale and the region is very real and will destroy community.

Proposed location

The proposed location for this hazardous industry does not make sense. Close to the town of Moss Vale, close to homes, preschools, two primary schools and Moss Vale High School, the size alone of this proposed factory is out of kilter with its surroundings. This is not the area for an industry of its size and intended, hazardous operations, together with the amount of traffic (heavy and light vehicles) that the facility will generate.

The proposed facility will be 90 metres from a newly zoned residential area.

It will be 150 metres from the nearest home.

It will be 650 metres from the nearest child care centre.

The site is landlocked with no road access. The Applicant has changed the proposed road access in previous applications, giving the impression that the Applicant seeks any means available to access what is an inaccessible site and therefore have this project approved.

The Applicant's claim that heavy haulage and other vehicles accessing the site will use only one route (via Berrima and Douglas roads) is disingenuous. My family has been involved in the road transport and logistics industry for over 60 years and the mantra is 'time is money'. Heavy haulage and other vehicles will use the quickest and most expedient route to access a factory or depot. It is highly likely that restrictions to use one route will be disregarded depending upon circumstances and vehicles will deviate via Moss Vale or Mlttagong to reach the site if this saves time (and money). Who is expected to monitor this? Wingecarribee Shire Council as the local road authority, not the Applicant.

Traffic in Moss Vale is already choked due to increases in population (eg considering the Government's housing strategy) and the Department of Planning has approved an 1100 plus residential housing development on its south eastern edge, with no infrastructure. Moss Vale cannot accommodate the huge number of vehicles that would access the site from either side of the Hume highway.

I am also concerned about the proposed use of Braddon Road given it is a residential road not one for industrial use; and that an existing level crossing in Berrima is to be moved at great expense (to taxpayers?) to benefit just one development, Plasrefine.

The proposed location of this industry (and the use of Braddon Road) is also not appropriate given Council's designated Southern Highland Innovation Park (SHIP) for creative, innovative and advanced manufacturing industry, not heavy and hazardous industry as represented by Plasrefine.

The SHIP aims to attract industry that will have a light footprint upon the local environment, while still providing employment opportunities and strengthening local agriculture and business. The SHIP Plan of Management (funded by the NSW Government) retains and supports the rural landscape of the area and will contain vegetation buffers to preserve the 'green in between' character of the Southern Highlands, valued by local residents and visitors alike. The SHIP Plan of Management also indicates that 'high impact employment' should be located around the existing Boral Cement Works surrounded by 'generous' vegetation buffers. Plasrefine does not appear to meet any of these criteria.

The proposed orientation of the facility is also inappropriate. The prevailing winds in the Southern Highlands is mostly from a westerly direction. No one in the Highlands would deliberately plan to have a major opening to vehicle or storage sheds facing west, due to the area's very strong westerly winds. Plasrefine has been designed in such a way that large trucks entering the facility would do so through doors facing west where contaminants would be easily blown around and out of the facility into the environment.

Fire

A fire at the proposed Plasrefine facility is inevitable,

There have been over 70 fires in plastics recycling facilities worldwide since 2019.

On Monday 4 November 2024 it was reported that a fire had broken out at a plastics recycling centre on the Pacific Highway at South Kempsey. Smoke was expected to settle over a wide area overnight.

Residents of the local area were advised to close all windows, doors and vents to protect against smoke entering their homes. Residents however expressed concerned about the late warning they received to close doors and windows. Some were already affected by smoke and asthma issues.

Fire at the Hume Material Recovery Facility in Canberra on Boxing Day 2022 demonstrated how quickly an industrial fire can spread even with a rapid emergency response. The facility was destroyed despite the actions of 18 fire units. The fire occurred in a secure industrial area far from residences, yet spread beyond the control of firefighters.

There have been other fires at plastics recycling facilities in Australia, including those in Victoria: Melbourne, Kilburn, Cambellfield, Kilburn and Dandenong. Fires at plastics sorting and reprocessing facilities in NSW include those at Belrose, Artarmon, Rockdale and Brooklyn. There have been fires in facilities in Western Australia and Queensland.

On Monday 28 October 2024 a fire broke out at a recycling plant in Villawood in Western Sydney. Quoting the *Daily Mail Australia*, more than 60 firefighters battled to prevent the

fire spreading to a nearby warehouse. 'Firefighters say strong winds and problems with water supply are complicating the operation. Firefighting efforts are being hampered by water supply issues and strong winds are pushing smoke in a northerly direction'.

Overseas, a fire at a plastic recycling facility in Richmond Indiana, USA in April 2023 saw the detection of toxic substances including hydrogen cyanide, benzene, chlorine, carbon monoxide and other volatile compounds, all serious carcinogens.

NSW Fire Service has indicated that smoke from any fire at the proposed facility will travel in an 'upwards' direction and so there is no risk to the community or the nearby Garvan Institute research facility. This is absurd. Prevailing winds in the Southern Highlands can measure anywhere between 60kpm to over 100kph and they generally blow in from the west. And there can be winds for 6 months of the year.

A Plasrefine fire will mean toxic black smoke blowing across Moss Vale and the Southern Highlands, reaching into Wollondilly Local Government Area, as well as South Western Sydney and the Illawarra. The number of people, animals (livestock and wildlife), homes, businesses and transport impacted by this would be large-scale.

For the safety of the local community, a Plasrefine facility needs to be located within a secure industrial site, away from, and contained within a substantial buffer zone to protect homes, schools and other vulnerable areas.

Bushfire

Moss Vale and the entire Southern Highlands experienced first hand the 2019-2020 bushfires. The Moss Vale township suffered ember attack from fires at the nearby villages of Bundanoon and Exeter. The Moss Vale Services Club, situated at the southern end of Moss Vale and acting as an evacuation centre for residents, had to itself be evacuated in January 2020 due to smoke from the fires.

The Rural Fire Services has identified the Plasrefine site as bushfire prone. The site is surrounded by grassland, paddocks and vegetation along the nearby creek.

Grass fires start easily and spread quickly. Grass fires are also very hot and can produce huge amounts of heat. Grass fires move fast, catching people off guard.

I understand that the Applicant has suggested that local fire fighting crews from Moss Vale, Bowral and Mittagong could attend a fire at Plasrefine. That's only 3 units. Only Mittagong has HAZMAT resources. Additional resources could travel from Campbelltown or Wollongong however there would be a wait time of 45 minutes or more for such resources to arrive on site. This is not viable.

The Plasrefine facility in its proposed location presents too much danger from fire to the Moss Vale and wider community.

Contaminants

The Plasrefine site sits within the Sydney Water Catchment Area which services more than 4 million people across Sydney, Wollongong, Goulburn, Lithgow, Nowra and the Southern Highlands

Open roller doors to the west in the proposed facility means that our high winds will release contaminants which will inevitably find their way onto the land and into local creeks and waterways - Sydney drinking water.

Drinking water across a wide region will be affected by micro/nano plastics and PFAS chemicals, which do not break down and are potentially linked to cancer.

There have been recent studies and media reports into the PFAS chemicals found in Sydney drinking water which have been found to be above recommended levels.

Sydney Water recently confirmed for the first time that cancer-linked "forever chemicals" have been detected across the city's drinking water catchments.

A 17 September 2024 report in the *Sydney Morning Herald* detailed that PFAS chemicals had flowed into a dam in the Blue Mountains, part of the Sydney Water Catchment Area and were detected at levels more than 50 times higher than Australian drinking water standards.

The *Sydney Morning Herald* of 20 August 2024 also detailed new research which showed high levels of PFAS in wildlife such as the platypus, in areas of the Sydney Water Catchment Area, suggesting that the chemicals had spread.

Dr Nicholas Chaertes from the University of Sydney was quoted expressing concern for a review of Australia's drinking water, saying:

There needs to be more urgency,' he said. This is a symbolic representation of a lot of environmental health threats where the benefit of doubt is given to the polluter and the public pays the consequence of that'.

Australian studies have shown links between PFAS contamination and ill health in other species, including platypus, according to the *Herald* report. In animal species, it has been linked to liver damage and damage to immune systems, low birth weight, birth defects, delayed development and newborn deaths.

The *Herald's* report stated that 'alarming' levels of PFAS had been found in the bodies of platypuses in NSW despite the fact that they were found in apparent pristine waterways.

Katherine Warwick from the University of Western Sydney is quoted:

'One of the biggest concerns to come out of our study is that some of the platypuses were found where there is no PFAS hotspot nearby....so the study has highlighted how widespread it is'.

In her study the bodies of 9 platypuses from different regions across NSW were found to have traces of PFAS in their livers. While the level of contamination differed, one platypus found dead in the water catchment at Wingecarribee River near Berrima had 390 micrograms of PFAS chemicals in its liver.

The article stated that high levels of PFAS contamination were also detected in river sediment close to Moss vale, Bowral and Mttagong.

The *Herald* article additionally quoted Dr Mariann Lloyd-Smith, a toxic chemicals campaigner who has served on United Nations expert committees, as saying that 'the Sydney catchment results demonstrated how essential widespread monitoring of PFAS is

and that these chemicals adversely impact everything from our children's development, to the integrity of our immune system and that there is no safe level of exposure...even when we're dealing with drinking water'.

I note the email from Dr Mark Bowman to Ms Kendall Clydsdale, Principal Case Officer, Office of the Independent Planning Commission NSW, which states that the potential risks from the release of 'unsafe levels of microplastics and other chemicals such as PFAS into the surrounding environment' raised by members of the community are not significant.

I note that Dr Bowman works for GHD and have previously described GHD's relationship with the Moss Vale community.

My own view is that the likelihood of contaminants leaking from the Plasrefine facility, through waste material and released into the air and local waterways, is inevitable.

On this basis alone and for the sake of our local platypus colony at Berrima, the Plasrefine proposal should be rejected.

The proposed Moss Vale Plastic Recycling Facility (SSD-9409987) should not be approved. I am not against progress and recognise the changing character of Moss Vale and its surrounds however any industry located in the Southern Highlands needs to be the 'right fit'. I appreciate the need to recycle plastics, however the risks associated with a plastics recycling facility located close to the town of Moss Vale, close to people's homes, businesses and schools are too great.

It will be managed by an owner/operator with no experience in the industry, supported by GHD which has refused to respect and listen to and collaborate with the community. I don't have any confidence in the standard of Plasrefine's proposed operations. I cannot 'embrace the official documents, published on the IPC website' as Ms Zhang expressed (Day 1 Public Meeting Transcripts). I have instead relied on 'other sources' as she describes them and have learnt much about my community and the possible damage to it and our surroundings that the release of microplastics and PFAS contaminants from an inappropriately located and possibly poorly managed plastic recycling facility represents.

Plasrefine's proposed location is just wrong. It will harm the Moss Vale and wider community - people, businesses, agriculture, the surrounding natural environment, the quality of our air and water and subsequently our unique wildlife - and our visitor economy. It will blemish Wingecarribee's Shire's reputation as a place valued by residents and visitors alike.

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