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OBJECT

Submission ID: 210589

Organisation: N/A	Key issues: Social impacts, Visual impacts, design and landscaping, Land use compatibility (surrounding land uses), Traffic, Other issues
Location: New South Wales 2578	
Attachment: N/A	

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I previously commented on this proposal and supported it broadly, but noted that rather than relying on heavy trucks, it should receive the material for recycling via railway. I also suggested that it use treated effluent from Moss Vale STP to clean the plastic and for any other processing requirements, and that it discharge any waste water at or above the quality that it imported it. I have since learnt more about the proposal and the various objections to it. I again note that I support the recycling of plastics, but we should be minimising our use of them first.

Having visited the proposed site twice, I now share concerns about it being inappropriate for the scale of the proposed facility. The proposed facility would be very large and imposing. The adjoining built land uses are much lower impact and range from rural land, to rural residential housing, to single-storey light industrial or biomedical uses.

The level of traffic generated by the proposed facility is incompatible with adjoining uses. Again, the facility should receive most of its plastic by rail, and this site does not have that facility. The facility would be better sited in an area with similar scale industrial uses, not near housing or sensitive biomedical facilities, and must have good access to a freight railway. Otherwise, it should be developed closer to where the bulk of its waste plastic would be generated, which is presumably Sydney. Whilst industrial land is likely cheaper in Moss Vale than much of Western Sydney, the tradeoff is a lot more distance travelled by a very large number of trucks. So this site is not suitable based on adjoining land uses and lack of effective access to the railway.

I am also concerned about the processing method that is proposed, and the potential for microplastics to escape to the air and water. Whilst this might be manageable within the facility, are adequate measures in place to contain this dangerous material in the event of an industrial accident or other systems failure? The Highlands is a relatively windy area because of its elevation, so an event that exposed microplastics to the air outside the facility could readily and rapidly disperse them, including into sensitive areas. Others have raised concerns about the potential escape of microplastics into the stormwater system and via watercourses, to Lake Burragorang. What containment measures are proposed to stop any such event? Additionally, how would any risk of PFAS contamination associated with microplastics be managed? Can the community have confidence in the proposed methods and in the EPA as regulator given the EPA's failings in relation to asbestos and other contaminants in landscaping supplies? Conditions of development consent could be imposed that intend to prevent or manage pollution risks, but if the regulator is under-resourced and client-captured (it clearly is or was in relation to the waste industry), will those conditions be enforced effectively?

There is significant community objection to the proposal based primarily on the inappropriateness of the location. Much like the IPC found in relation to the Hume Coal proposal, which it rejected on grounds including social division, this proposal has already divided the community and may continue to do so were it approved. The Hume Coal proposal caused strong divisions and fears. The Plasrefine proposal is having the same effect but with a greater level of fear because of pollution and heavy traffic concerns.

Whilst we certainly need a plastics management strategy at national and State levels, and recycling has to be part of that for quite some time because of the amount of plastics already in need of reprocessing, this site is inappropriate for such a large and all-hours facility that would be dependent on a large volume of heavy truck traffic. Instead, the State should help the proponent find a site that is well clear of residential and other sensitive land uses, has access to freight rail that would be the primary source of incoming plastic and



potentially a significant route for outgoing processed material, that would only make relatively minor and local use of trucks during its operation, and that would be able to operate such that any industrial accident could not result in the escape of microplastics into a) residential areas, b) sensitive natural areas, c) potable water catchments. I note that it is NSW Government policy to improve the freight rail network within the State, and to encourage greater use of it, in part to reduce heavy truck traffic on roads, and to reduce maintenance and pollution costs associated with heavy truck traffic.

Sincerely,

Dr S. Douglas
