

Our Ref: SSD 9409987

Mr Stephen Barry
Planning Director – NSW Independent Planning Commission

14 January 2025

Subject: Moss Vale Plastics Recycling Facility (SSD 9409987) – Response to Request for Information

Dear Mr Barry

I refer to the request from the Independent Planning Commission (the Commission) dated 6 December 2024 seeking a response from the Department on a range of matters arising from the Public Meetings and submissions received by the Commission for the Moss Vale Plastics Recycling Facility (SSD 9409987).

1. Cumulative opening time for roller doors

The Department provided its response on this matter to the Commission on 6 December 2024 (see **Attachment 1**).

2. Firefighting capacity

Community members raised concerns in the Public Meetings about the capacity of the local fire brigade to respond to a fire at the plastics recycling facility. During its assessment, the Department consulted with Fire and Rescue NSW (FRNSW) and requested the Applicant to provide specific details of local fire response capacity. FRNSW's advice of 16 March 2022 recommended that operational capacity of local fire agencies be included in the comprehensive Fire Safety Study (FSS) to be developed in consultation with FRNSW. As requested by the Commission, the Department has sought further advice from FRNSW on this issue.

FRNSW's response is attached (**Attachment 2**) and includes details of FRNSW's Emergency Services Computer Aided Dispatch system and dispatch times and capabilities of the local fire trucks.

3. Bushfire hazard

In October 2020, Rural Fire Service (RFS) advised the Department the site of the proposed plastics recycling facility was not located on bushfire prone land, and it had no specific requirements in this regard. It appears, however, that bushfire mapping for the site contained some inconsistencies and a small part in the south of the lot adjacent to the development is now classified as bushfire prone. In

accordance with the Commission's request, the Department has referred the Applicant's Bushfire Impact Study (which was provided directly to the Commission and dated 25 November 2024) to RFS for review and advice.

The response from RFS is provided in **Attachment 3**. It provides RFS' recommendations for Asset Protection Zones, landscaping, construction standards, property access, and water and utility services at the plastics recycling facility.

4. Wingecarribee Shire Council submission

Introduction

Wingecarribee Shire Council (Council) provided a submission to the Commission dated 5 November 2024 which outlined its opposition to the development. The Commission has requested the Department respond to issues raised in item 4 of Council's submission which relate to the 'workability' of the proposed relocated level crossing (of Collins/Douglas Road and the private Boral Branch Line) and heavy vehicle movements.

In its submission, Council states its opinion that any 'road and rail interface issues' should be fully resolved prior to determination of the SSD application, rather than following determination. It also states that the development involves 'excessive truck movements' which will compromise the Southern Highlands Innovation Park (SHIP).

Currently, recommended conditions B17 and B22 relate to level crossing design and safety, and operational traffic management.

Advice from Council

The Department consulted with Council throughout its assessment of the proposed development, including regarding the relocation of the level crossing, the preliminary design of the level crossing, and the amended heavy vehicle approach route for the site. Although Council consistently objected to the development on strategic grounds, it provided advice on the final road alignment which was generally supportive except for a few concerns which the Department addressed via its recommended conditions. The following provides an outline of Council's advice on this matter:

- In its advice to the Department of **16 November 2023**, Council advised the amended traffic route (the "north south" route) is reasonable and noted the relocated level crossing would go through the Australian Level Crossing Assessment Model (ALCAM) process to determine the appropriate risk. Condition B17 requires an ALCAM to be prepared once detailed design of the level crossing is further advanced, prior to its construction.

- In its advice of **6 May 2024**, Council advised that it considered the main issue with the proposed level crossing design was that it only accommodates vehicles up to the size of B Double trucks (up to 26 metre (m) in length) which would preclude occasional use by A Double trucks, which are up to 36.5 m in length. As such, the Department included a requirement in Condition B17 that the final design of the level crossing provide for its use by A Double trucks. It should be noted that the largest trucks accessing the plastics recycling facility would be semi trailers with a maximum length of 19 m.
- On 7 May 2024, following review of Council's 6 May response, the Department emailed Council to clarify that it was specifically seeking a response to the advice provided by Transport for NSW (TfNSW) on 13 March 2024 regarding Council's responsibilities as Road Manager for the level crossing under the *Rail Safety National Law (NSW)*. On **24 May 2024** Council provided a response table which addressed each comment. In summary, Council advised that, although it did not support the proposal from a strategic point of view, it considered the Applicant had provided all technical requirements with regard to the application. Council also advised the level crossing preliminary design appears to meet the relevant standards, however, requested a plan with dimensions and lane widths to confirm this. To ensure this detail is fully considered, the Department has included in Condition B17 the requirement for the Applicant to finalise the detailed design of the level crossing in consultation with Council and Boral (owner of the rail line and Rail Infrastructure Manager).

Department's response

The Department's assessment of the development found that operational traffic impacts on the surrounding road network would be low, including on Collins/Douglas Road where both the existing and proposed relocated level crossing are located. The Applicant's Traffic Impact Assessment (TIA) conservatively included assessment of anticipated traffic delays at the level crossing from one train during the busiest hour (noting there are around three trains per day).

It should be noted that the proposed level crossing would directly replace a level crossing 190m to the east which has been in use for many years. The existing level crossing would be closed when the new one is commissioned. Collins/Douglas Road is currently a designated B double route; however, Council has advised that under specific circumstances it authorises its use for A double trucks.

The Applicant provided information on the level crossing which included design drawings, sight distances, swept path analysis for B double trucks and a preliminary Road Safety Audit. The Department reviewed this together with TfNSW and provided the information to Council for review. As owner of the rail line, Boral raised no concerns with the level of risk at the level crossing.

In its submission to the Commission, Council states it is the Department's responsibility to assess design requirements prior to determination of the SSD application. As discussed above, the Department has undertaken the required environmental impact assessment of the development as a whole, which has shown any potential impacts can be managed. An ALCAM determines the appropriate treatments at level crossings (such as boom gates, lights, bells) based on safety and risk data. As sight distances at the level crossing have been shown to be satisfactory, there appears to be no indication that detailed engineering design would give rise to an 'unworkable' level crossing, especially given the low daily train numbers. Condition A2(c) requires the level crossing detailed design to be consistent with the design drawings provided as part of the assessment documentation.

Under the *Rail Safety National Law (NSW)*, it is Council's responsibility as the Road Manager and Boral as Rail Infrastructure Manager to identify and assess risks to safety that may arise from the existence or use of any rail or road crossing and determine measures to manage those risks. The Road Manager and Rail Infrastructure Manager must seek to enter into an interface agreement to manage risk. During consultation, neither Boral nor Council indicated these risks are unacceptable and/or cannot be managed.

In relation to the timing of the detailed design and any interface agreement, it is noted that the *Rail Safety National Law* does not include timing for the preparation of these. The timing of Condition B17 requires the Applicant to undertake a road safety audit and ALCAM and finalise designs in consultation with Council (the Road Manager) and Boral (the Rail Infrastructure Manager) before construction can commence. This would mean that full details of the road upgrades and level crossing design would be considered and agreed upon (as well as constructed) prior to commencement of onsite construction of the plastics recycling facility itself (see Condition B18). It should be noted that finalising detailed design for infrastructure following approval of a development is common practice, and, where required a modification of development can be requested to align with the detailed design of the level crossing.

The heavy vehicle site access route was amended by the Applicant to address the community's concerns about heavy vehicles traveling through residential streets. The TIA undertaken for the development showed that the planned heavy vehicle movements can be accommodated on the surrounding road network. Regarding Council's concerns about 'excessive' heavy vehicle numbers traveling through the SHIP, the Department notes that traffic from any future development planned for the southern edge of the SHIP would have to travel through the SHIP along Douglas Road, Berrima Road to Old Hume Highway, unless they use Beaconsfield Road or approach from the Moss Vale town. Notwithstanding, the Department does not consider 5 heavy vehicles an hour to be 'excessive',

particularly when the E4 zone permits warehouses, distribution centres and freight transport facilities which, in the Department's experience, can generate many hundreds of operational heavy vehicle trips per day. In addition, the concrete batching facility recently approved on Red Fields Road would generate seven times more heavy vehicles than the Plasrefine proposal in the morning peak hour, a large percentage of which would travel through the SHIP with the remainder permitted to travel through town.

In conclusion, the Department finds there is no evidence to support Council's assertion that the workability of the level crossing is in question. Accordingly, the Department reaffirms the conclusions documented in its Assessment Report and the recommended conditions of consent.

5. Garvan Institute of Medical Research submission

In its submission to the Commission of 2 December 2024, the Garvan Institute of Medical Research (Garvan) raised concerns relating to the suitability of a number of recommended conditions to protect the Australian Bioresources (ABR) facility from noise, vibration, air and fire impacts. The Commission has requested the Department to respond to these concerns.

The Department is fully aware that the work of the ABR is important to medical research, and it met on several occasions with the ABR management to keep them informed and understand any risks to its operations.

Noise and Vibration

The Department's assessment of the application recognised the sensitivity of the ABR facility to potential vibration impacts (see Section 6.3 of the Department's Assessment Report dated October 2024). Department staff with expertise in noise and vibration reviewed initial vibration information provided by the Applicant. In its Request for Additional Information dated 8 February 2024, the Department requested further assessment of construction vibration based on vibration criteria specified in scientific research on rodent behaviour (50 $\mu\text{m/s}$), as well as further engagement with the ABR facility to determine which laboratory and other works are sensitive to vibration and whether they are sensitive to vibration levels below 50 $\mu\text{m/s}$. The Applicant consulted with ABR staff who were unable to confirm whether its activities would be sensitive to vibration levels below 50 $\mu\text{m/s}$. The Applicant provided a Vibration Study (prepared by GHD in February 2024) which found that 75m is the safe working distance from the ABR facility to ensure compliance with the 50 $\mu\text{m/s}$ vibration criteria. As a precaution, the Vibration Study proposed a warning trigger level of 25 $\mu\text{m/s}$ to alert construction staff that the vibration criteria of 50 $\mu\text{m/s}$ is being approached. The Department's

assessment concluded the risks of construction vibration impacts were low subject to implementation of the recommendations in the Vibration Study.

In this context, it is important to note that Condition A2 is a standard condition included in all the Department's consents to ensure that all details provided, and commitments made by the Applicant in its application documents, assessment and mitigation measures are included in the conditions. This means that, while the Department's recommended conditions are comprehensive, they are not required to list every detail of the commitments and mitigation measures.

Condition A2 requires the development to be carried out in accordance with the Applicant's management and mitigation measures, Environmental Impact Statement, Response to Submissions (RTS), Amendment Report, Amendment RTS and the Additional Information, which is defined in the consent and includes the Vibration Study. Specifically, the GHD Vibration Study committed the Applicant to preparing a vibration management plan, monitoring vibration levels, implementing a trigger action response plan to alert workers to stop work as necessary, utilising static rollers to minimise vibration generation, and scheduling vibration intensive activities to occur outside embryo microinjection activities.

As discussed in its Assessment Report, the Department was satisfied vibration impacts on the ABR could be satisfactorily managed by the Applicant. However, to further address the concerns about vibration raised by the ABR, the Department included the following specific conditions in its recommendation to the Commission:

- **Condition B52:** limits on construction vibration levels
- **Condition B53:** restriction on the maximum allowable work distance between vibratory rollers and the ABR facility, unless vibration monitoring (as per the GHD Vibration Study) confirms compliance with vibration limits at closer distances
- **Condition B54:** requirement for the preparation and implementation of a Construction Noise and Vibration Management Plan (CNVMP) in consultation with the ABR facility and to the satisfaction of the Planning Secretary.

Together, these conditions establish the baseline requirements for developing a practical, actionable, and enforceable CNVMP to be implemented by the construction contractor. It is important to note that this plan would require further approval by the Planning Secretary, as per condition B54, after the Applicant and its construction contractor finalise the construction methods and associated vibration controls.

In the event the safeguards and specific conditions prove insufficient to minimise vibration impacts on the ABR facility, **Condition A1** obligates the Applicant to implement all reasonable and feasible measures to prevent or minimise material harm to the environment. This includes addressing potential harm arising from construction, operation, or required rehabilitation activities.

The Department acknowledges the concerns raised in the Garvan's submission to the Commission. Specifically, the Garvan expressed satisfaction with the vibration limit of 50 $\mu\text{m/s}$ but indicated that the recommended conditions did not appear to explicitly incorporate certain mitigation and management measures outlined in the GHD Vibration Study.

As discussed above, while these measures have been included as part of the recommended conditions (as measures in the GHD Vibration Study form part of the Additional Information), it could be open to the Commission to consider specifying the measures in Condition B54 as follows

Condition B54: *The Applicant must prepare a Construction Noise and Vibration Management Plan (CNVMP) for the development to the satisfaction of the Planning Secretary. The CNVMP must form part of the CEMP in accordance with condition C2 and must:*

- (a) be prepared by a suitably qualified and experienced noise expert whose appointment has been endorsed by the Planning Secretary;*
- (b) be prepared in consultation with the ABR Facility;*
- (c) describe the procedures to:*
 - (i) refine the construction methodology to minimise vibration impacts at vibration sensitive areas identified in Figure X, including, as necessary, the use of a non vibratory ground compaction techniques;*
 - (ii) determine safe working distances for vibration intensive works based on in situ conditions;*
 - (iii) conduct real time vibration monitoring to trigger warning notifications at 25 $\mu\text{m/s}$ and issue stop work notifications when the vibration limit specified in condition B52(c) is exceeded;*
 - (iv) conduct real time noise monitoring to trigger mitigation actions when the construction noise limits specified in condition B51 is exceeded;*
 - (v) achieve the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009) (as may be updated or replaced from time to time);*
- (d) identify a work schedule that minimises vibration intensive works during embryo microinjection activities at the ABR facility;*

(e) include:

- (i) strategies that have been developed with the community and the ABR Facility for managing high noise and vibration generating works, such as the use of alternative construction with lower source vibration levels and the provision of respite periods;
- (ii) a description of contingency measures in the event management actions are not effective in reducing noise and vibration levels to an acceptable level;
- (iii) a complaints management system that would be implemented for the duration of the development.

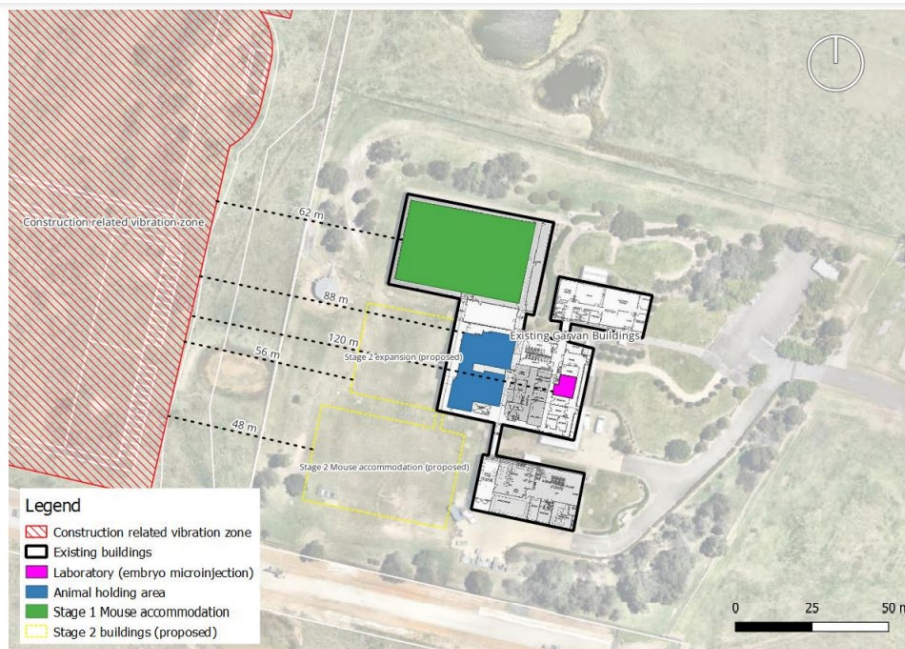


Figure X

In addition to construction related vibration, the Department acknowledges the Garvan Institute’s concerns about potential vibration impacts arising from the operation of the development. The Department notes that operational vibration sources would be limited to trucks travelling to and from the premises and machinery operating indoors on a concrete slab. Even though operational vibration is expected to be low, to address the Garvan’s concerns, the Commission may consider amending **Condition B52** to also apply to the operational phase.

Air Quality

The Garvan expressed concern that the Department’s proposed conditions B43 and B46 do not impose sufficient limits and conditions with references to the data contained in the Applicant’s

Environmental Impact Study Technical Report 3 Air Quality and Odour in relation to fugitive emissions or other air quality hazards. The Department's recommended Conditions B43 and B46 are as follows:

- **Condition B43:** the Applicant must install and operate equipment in line with best practice to ensure that the development complies with all load limits, air quality criteria/air emission limits and air quality monitoring requirements as specified in the Environmental Protection Licence (EPL) applicable to the site. The installed equipment must be able to be retrofitted or upgraded.
- **Condition B46:** the Applicant must ensure the development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).

Modelling undertaken and described in the Applicant's Air Quality Impact Assessment (AQIA) demonstrated that the facility would meet the strict criteria in the EPA's *Approved Methods for Modelling and Assessment of Air Pollutants in New South Wales* and the *NSW POEO Clean Air Regulation*, for all pollutants expected to be emitted, subject to the installation of air pollution control equipment.

The EIS and RTS detail specific requirements for the proposed pollution control equipment. The Applicant's Management and Mitigation measures commit to ensuring operational processes with the potential for emissions to air do not operate if the pollution control systems are not effectively working. As discussed above, Condition A2 ensures the commitments in these documents form part of the consent, without the need to detail each commitment within the conditions.

Following from this, to comply with the consent, the Applicant must install pollution control equipment that meets the requirements outlined in the EIS and Rts and that can achieve the emission levels modelled. It is important to note that any EPL will include the specific limits identified in the AQIA that are protective of the surrounding receivers. Condition B43 requires the Applicant to comply with these limits. The EPA would have responsibility for regulating air emission limits in the EPL.

In addition to the above, Condition B47 requires three separate rounds of validation monitoring and reporting for air emissions. The first of these would occur six months after the commencement of operations, with further validation to occur at two years and again at full operation (receipt of 120,000 tpa of plastic waste). These requirements for validation monitoring would provide a high level of certainty about the level of air emissions as the Applicant would have to confirm on three occasions that the air pollution control equipment is working as modelled and provide a range of contingency measures if it is determined it is not. Condition B43 allows for the upgrade of equipment if the validation modelling determines it is not working as predicted.

In addition, Conditions C10 – C17 require the Applicant to undertake regular auditing and reporting on compliance with conditions of consent and environmental performance to ensure the facility operates in accordance with the conditions of consent. Both the EPA and the Department are responsible for ensuring compliance with the EPL and consent through their review of monitoring and audit results.

Given the above, the Department finds the recommended conditions of consent are robust and provide limits which are linked to the Applicant's Environmental Impact Study Technical Report 3 Air Quality and Odour.

Fire

Given the sensitivity and importance of the work the ABR, throughout its assessment the Department endeavoured to work closely with the ABR to manage any risks to its operations to acceptable levels. The Department acknowledges, however, that risks from fire cannot be completely eliminated and has recommended a range of conditions to mitigate fire risk as much as possible. The Department notes the Garvan's concern that developing procedures to quickly notify ABR staff of a fire appears to provide little protection, however it is important to note that the recommended conditions are primarily focussed on prevention of fire and its rapid extinguishment, and as such they represent best practice protection for the ABR facility as well as the surrounding community.

The Applicant has designed the development in accordance with stringent guidelines, standards and reports including the FRNSW Fire Safety Guidelines *Fire Safety in Waste Facilities* (the *Guidelines*). The Guidelines detail FRNSW's requirements for the adequacy of fire safety systems, safe stockpiling of combustible waste, and procedures and operational needs of firefighters in the event of a fire.

Examples of measures included in the development which would reduce fire risk include:


- receipt of pre sorted plastic waste (significantly reducing the fire risks posed by hidden batteries)
- controlled plastic storage limits on stockpile sizes and separation of stockpiles by concrete walls
- internal roof sprinklers
- ring main for fire hydrants
- booster pumps
- ring road for fire brigade access to all sides of buildings
- staff onsite 24 hours per day ensures someone is present at the facility to quickly contain any fires

To ensure the final design of the development continues to minimise the risk of fire, Condition B60 requires a Fire Safety Study (FSS) to be undertaken before construction of the development commences. A FSS is a comprehensive document which details the proposed fire prevention, detection, protection and fighting measures to ensure they are appropriate and adequate to meet the extent of potential fires. The FSS is to be prepared to the satisfaction of FRNSW, who will be responsible for ensuring it is robust and all requirements are met. Implementation of the measures in the FSS would ensure the risk of a fire taking hold within the plastics facility is low.

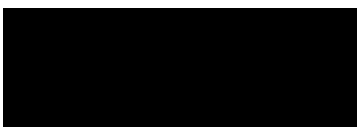
Noting the above, the Department finds the recommended conditions of consent relating to fire are robust and provide appropriate protection for the ABR facility.

6. Questions on Notice from stakeholder meeting of 3 December 2024

- a. Environment Protection Authority (EPA) – the EPA’s response is attached as **Attachment 4**.
- b. NSW Health – NSW Health’s response is attached as **Attachment 5**.

Should you have any questions in relation to the Department’s response, please contact me on 

Yours sincerely



Chris Ritchie

**A/Executive Director
Energy, Resource and Industry Assessments**

Attachments:

1. Response from Department dated 6 December 2024
2. Response from FRNSW
3. Response from RFS
4. Response from EPA
5. Response from NSW Health

Our Ref: SSD 9409987

Mr Stephen Barry
Planning Director – NSW Independent Planning Commission

6 December 2024

Subject: Moss Vale Plastics Recycling Facility (SSD 9409987) – Response to Question on Notice

Dear Mr Barry

During the online public meeting of 12 November 2024 for the Moss Vale Plastics Recycling Facility, the Department committed to providing further information to the Independent Planning Commission (the Commission) relating to the length of time the roller doors on the western side of Building 1 would be open and whether the Department's assessment and conclusion remained the same based on this duration. In its presentation at the online public meeting, the Applicant advised these roller doors would be open for a total of five hours per day to allow for delivery of waste plastic.

It should be noted that this five hour timeframe does not align with the Department's understanding of the door opening timeframes provided in the Applicant's Environmental Impact Statement (EIS) which formed the basis of its assessment.

Further Information

The Department has sought further clarification from the Applicant's consultant GHD around vehicle access door opening times. A copy of GHD's response (dated 15 November 2024) is attached. Importantly, the response revised GHD's advice from the public meeting and clarified that the total door open time would not be five hours per day and is actually predicted to be 42 minutes per day in total. The 42 minute timeframe assumes the doors would be open for a total of 50 seconds per truck under a worst case scenario of 50 trucks per day when the site is operating at full capacity of 120,000 tonnes per annum.

- 50 seconds per truck = 30 seconds (truck arrival) + 20 seconds (truck departure)
- 50 trucks x 50 seconds per truck = 42 minutes per day

Waste plastic would only be delivered to the site between 7am and 6pm Monday to Friday. Outside of this time, while the facility is operating the roller doors would be kept closed at all times.

Department's Assessment

The Department's consideration of noise and air quality for the development noted the public's concerns raised in submissions. The Department's assessment was based on information provided in the application documentation and advice received from the NSW Environment Protection Authority (EPA) and is documented in its Assessment Report dated October 2024.

Operational Noise

The Applicant's Noise Impact Assessment (NIA) provided with the EIS included modelling of a scenario where four roller doors (Building 1 – one door in each of the eastern and western façade + Building 2 – one door in each of the southern and western façade) are open 10% of the time during waste receipt hours (10% of 11 hours per day = 66 minutes per day). This assessment predicted the energy average operational noise level over a 15 minute assessment period (denoted as $L_{Aeq,15min}$) of, for example, up to 39 dB(A) at 72 Beaconsfield Rd and up to 34 dB(A) at 50A Bulwer Rd could comply with the EPA's project noise trigger levels of 41 dB(A) and 40 dB(A), at each respective residence (noting these residences were deemed potentially most affected by noise from the development).

Following review of the EIS, the Department requested the Applicant provide additional information to clarify certain noise model inputs. However, the Applicant's response did not adequately address the queries raised. As a result, the Department issued further requests for clarification on limitations and assumptions in the noise assessment, specifically:

- how noise egress from the warehouse buildings would be controlled to ensure it does not exceed 85 dB(A) across the building envelope (e.g. façade openings)
- how rooftop skylights and windows (used for ventilation) had been modelled, noting that noise can more easily transmit through these building elements as the material density of glass is lower than for the wall and roof structures
- how the various heavy vehicle manoeuvres, such as acceleration and reversing movements, had been modelled

Additionally, the Department requested the Applicant conduct a sensitivity analysis to assess the likely noise impact under the scenario where all roller doors are open over a 15 minute assessment period.

It is important to note, that under its regulatory framework for industrial noise, the EPA has set the sampling period for noise to be 15 minutes measured during the times when maximum impacts occur (refer to Section 2.2 and Table A1 of the *Noise Policy for Industry*). To minimise the likelihood of actual noise limit exceedance during operation, it is standard practice for the Department to request that

Applicants consider a worst case noise emission scenario. In the case of this development, the Department requested that the modelling assume the roller doors could be open for the entire 15 minute period.

The Department also requested the Applicant to update its model to account for a potential scenario whereby the maximum number of trucks per hour (5 trucks) are onsite and the roller doors are open during the same 15 minute assessment period. These requests were made to ensure a robust assessment (worst case scenario) based on the Department's extensive experience in assessing and regulating industrial developments across NSW.

The Applicant subsequently updated its operational noise model, as described in its additional noise assessment dated 30 January 2024. To add rigour to the assessment, the operational noise model was updated to include the following items which more realistically reflect the proposed operation of the development:

- closed skylights in the development's roof structure to better account for potential noise egress paths
- distinct heavy vehicle operations such as idling at weighbridge, forward movement within the site and reverse movement into the warehouse building, which increased the development's overall noise emission compared to assumptions made previously
- a typical heavy vehicle movement scenario, with a maximum of five heavy vehicles entering and exiting the site per hour (equivalent to 1.25 heavy vehicles in any given 15 minute period)
- a worst case heavy vehicle movement scenario, with five heavy vehicles performing various operations on the site within the 15 minute assessment period, noting that the development can only facilitate plastic waste drop off by three heavy vehicles simultaneously (given there are only three access doors at the plastic drop off areas)
- all western roller doors opened during any given 15 minute assessment period

Compared to levels reported in the EIS, the updated model predicted worst case operational noise at 72 Beaconsfield Rd and 50A Bulwer Rd to be 2 dB(A) and 5 dB(A) higher, respectively. Despite this increase, the Applicant's updated noise assessment demonstrated that the operation of the development can still comply with the relevant project noise trigger levels noting the above mentioned conservative nature of the assessment.

To ensure the Applicant operates the development in a manner that ensures it would not exceed its assumed worst case scenario, the Department conservatively recommended the following conditions:

- roller doors to be kept shut when not in use (Condition B57(b)) – i.e. can only be opened for entering and exiting trucks
- restricting heavy vehicles to two egressing per 15 minute period (Condition B57(c)) – to ensure that actual operations align with the outcomes of the sensitivity analysis

It should be noted that the additional information provided by GHD on 15 November 2024 clarified that the roller doors would be open for considerably less time (maximum of 30 second bursts at a time) than was assumed for the sensitivity analysis (15 minute conservative modelling whereby the doors were assumed to be open for the whole period) and also less than in the original NIA (10% of an 11 hour day).

Accordingly, the Department finds the conclusions documented in its Assessment Report dated October 2024 remain valid and that the likely noise impact associated with operation of the development is considered acceptable in line with the EPA's *Noise Policy for Industry*. The EPA also accepted the predicted outcomes and recommended operational noise limits.

Further, in relation to the online public meeting and the question asked by the Commission, I made reference to recommended conditions that require the facility to stop operating while roller doors are open. I wish to clarify that the conditions (B44(d) and B57(b)) actually make reference to the doors needing to be shut while they are not in use, rather than the Applicant only being able to operate if the doors are shut. So, in conclusion, I wish to clarify that the roller doors are to be open only when needed for operational purposes such as truck access.

Air Quality

The Applicant has advised the industrial buildings would operate under negative air pressure, which is common in waste facilities to prevent air quality impacts. In a negative pressure environment, exhaust systems remove air, which creates lower air pressure within the building than the air pressure outside. This air pressure gradient means that, when doors open, air flows from the higher pressure outside into the lower pressure inside. A negative air pressure environment therefore ensures that particles in air, including microplastics, remain inside the buildings even when doors are open.

As noted above, the roller doors on the western side of Building 1 are only predicted to be open for a total of 42 minutes per day (30 seconds maximum at a time) when trucks are delivering waste. While the Department acknowledges the community concern that plastic, including microplastic could 'blow out' of the facility if the doors are open, this would be unlikely to occur due to negative air pressure within the building.

Furthermore, as noted in the Applicant's Technical Report – Air Quality and Odour (Chapter 5), all activities with the potential to generate emissions (particulate matter (PM) including microplastics and Volatile Organic Compounds (VOCs)) would be controlled via capture of emissions and piping to an air pollution control system for staged treatment before being discharged via one of the roof stacks. Emissions from operations would be contained by the air pollution control system and would not be released within the building.

As noted in the Department's Assessment Report, air quality assessment of emissions from the stacks predicted pollutants of concern (PM and VOCs) to be below the relevant impact assessment criteria from the *Approved Methods for Modelling and Assessment of Air Pollutants in NSW*.

The Department conservatively recommended the following conditions, among others, to add an extra layer of certainty for the community regarding air quality:

- roller doors to be kept shut when not in use (Condition B44(d)) – i.e. can only be opened for entering and exiting trucks
- verification of actual air emissions on three occasions following commencement of operations (Condition B47) – to ensure that actual emissions align with predicted

The Department reaffirms that the conclusions documented in its Assessment Report dated October 2024 relating to air quality impacts remain valid.

Should you have any questions in relation to the Department's response, please contact me on [REDACTED]

Yours sincerely

[REDACTED]
Chris Ritchie

**A/Executive Director
Energy, Resource and Industry Assessments**

From: Lynden Moyes
Sent: Wednesday, 18 December 2024 12:09 PM
To: Sheelagh Laguna
Cc: Christopher Ritchie; Joanna Bakopanos; Emma Barnet; James.OCarroll; Michael Hreszczuk
Subject: RE: Moss Vale Plastic Recycling Facility

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Sheelagh,

With regard to the Commission’s request for further information specifically, “*What local operational capacity is likely needed for the development proposal and if it is achievable.*” FRNSW offer the following response and further information.

FRNSW previous recommendation provided in letter dated 16 March 2022 (D22/20251) for the proposal states “*That a comprehensive Fire Safety Study (FSS) is developed. The FSS is to be developed in accordance with the requirements of Hazardous Industry Planning Advisory Paper (HIPAP) No.2.*” The preparation of a FSS in accordance with HIPAP2 would examine the specific risks of the proposed facility and propose mitigation measures to deal with potential fire scenarios at the proposed facility. Further, FRNSW previous recommendation states “*the need for the facility to achieve an adequate level of on-site fire and life safety independence.*” This requires the FSS to propose mitigation measures for potential fire scenarios that adequately deal with the scenario without any Emergency Service intervention or contain the potential fire scenarios preventing escalation before the arrival of emergency services to intervene.

FRNSW utilises an Emergency Services Computer Aided Dispatch (ESCAD) system to ensure all emergency calls are responded to as quickly and efficiently as possible. This incorporates live vehicle tracking via GPS, calculation of vehicle travel times and allocation and turn out of appropriate resources based on emergency incident type. This system ensures the closest available appropriate resource is dispatched in a timely manner to any emergency. FRNSW capability within the Southern Highlands area consists of the following resources:

385 Moss Vale consisting of 1 Fire Truck (Pumper), 234 Bowral consisting of 1 Fire Truck (Pumper), 378 Mittagong consisting of 1 Fire Truck (Pumper) and 1 Intermediate HAZMAT tanker and 242 Bundanoon consisting of 1 Fire Truck (Pumper) with Community First Response (Medical) Capability.

FRNSW fire trucks (pumpers) carry a crew of 4 F/F’s trained to respond to urban fires including fires at facilities such as the proposed. A type 2 FRNSW pumper such as those stationed at the Southern Highlands stations carry minimum 2000 L of water and are capable of pumping water at 2,900 L/min at 1,000 kPa. These fire trucks are reliant on accessing water supplies such as reticulated water or static water sources to supply these volumes.

A mock response scenario was run in the ESCAD system to determine realistic response times for FRNSW to attend the address of the proposed facility. FRNSW are reliant on the actions of the first arriving FRNSW officer (OIC of the first arriving appliance) to determine and request the required response dependent on the emergency scenario they are confronted with. The mock scenario involved a “second alarm response” which would be a typical response to a confirmed fire at a facility such as the proposed. The scenario was run real time at 1219 hrs on Monday 16 December 2024. The resultant response times are outlined in the table below:

P385	MOSS VALE	PUMPER	11MINS
P234	BOWRAL	PUMPER	20MINS

P242	BUNDANOON	PUMPER	24MINS
CP378	MITTAGONG	RESCUE PUMPER	24MINS
RP207A	ALBION PARK	RESCUE PUMPER	46MINS
LP503	WOLLONGONG	AERIAL	53MINS

This represents the time taken for FRNSW to arrive on scene before any actions could be taken to start dealing with an emergency at the facility.

Hope this helps,

Regards,

Lynden



INSPECTOR LYNDEN MOYES

Team Leader Fire Safety
Operational Support and Special Hazards | Fire and Rescue NSW

E: [REDACTED]
T: [REDACTED] | M: [REDACTED]

1 Amarina Ave, Greenacre NSW 2190 | Locked Bag 12, Greenacre, NSW 2190

PREPARED FOR ANYTHING.

www.fire.nsw.gov.au



From: Sheelagh Laguna [REDACTED]

Sent: Monday, 9 December 2024 6:03 PM

To: Lynden Moyes [REDACTED]

Cc: Christopher Ritchie [REDACTED]; Joanna Bakopanos

[REDACTED]; Emma Barnet [REDACTED]

Subject: Moss Vale Plastic Recycling Facility

Hi Lynden

The SSD application for the Moss Vale Plastic Recycling Facility is currently before the Independent Planning Commission (IPC) for determination following finalisation of the Department’s assessment in October 2024. Further information about the development can be found at <https://www.planningportal.nsw.gov.au/major-projects/projects/moss-vale-plastics-recycling-facility>

Further to concerns raised by community members, the IPC has requested the Department to seek further advice from FRNSW regarding operational firefighting needs for the proposed development (see excerpt below).

2. Throughout the Public Meeting, community members raised concerns about the operational capacity of local fire agencies to adequately respond to a potential fire event at the site. The Commission notes that the Department's recommended conditions of development consent include a requirement for operational capacity to be considered in the fire safety study for the project, as recommended by Fire and Rescue NSW (**FRNSW**). The Commission requests that the Department seek advice from FRNSW on what specific local operational capacity is likely needed for the development proposal and if it is achievable.

In terms of timing, it would be appreciated if you could provide this advice to us by mid next week so we can include it in a consolidated response.

If you have any questions or would like to discuss, please let me know.

Thank you in advance.

Kind regards

Sheelagh Laguna
Principal Planner
Industry Assessments

Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street | Locked Bag 5022 | Parramatta NSW 2124

T [REDACTED] E [REDACTED]



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This message has been scanned for viruses.



RFS



Department of Planning, Housing & Infrastructure (Parramatta)
Locked Bag 5022,
PARRAMATTA NSW 2124
Australia

Your reference: SSD-9409987
Our reference: DA20241210005182-Original-1

ATTENTION: Sheelagh Laguna

Date: Thursday 19 December 2024

Dear Sir/Madam,

Development Application

Other - Other Assessment - Waste or resource management facility

Review - Moss Vale Plastics Recycling Facility - 74 - 76 Beaconsfield Road Moss Vale NSW 2577, 11//DP1084421

I refer to your correspondence regarding the above proposal which was received by the NSW Rural Fire Service on 10/12/2024.

The NSW RFS has reviewed the Bushfire Impacts Review submitted for the construction and operation of a proposed plastics recycling and reprocessing facility at the subject site and provide the following recommendations:

Asset Protection Zones

The intent of measures is to minimise the risk of bush fire attack and provide protection for emergency services personnel, residents and others assisting fire fighting activities. To achieve this, the following conditions shall apply:

1. From the start of building works, and in perpetuity to ensure ongoing protection from the impact of bush fires, the entire property must be managed as an inner protection area (IPA) in accordance with the requirements of Appendix 4 of *Planning for Bush Fire Protection 2019*. When establishing and maintaining an IPA the following requirements apply:

- tree canopy cover should be less than 15% at maturity;
- trees at maturity should not touch or overhang the building;
- lower limbs should be removed up to a height of 2 metres above the ground;
- tree canopies should be separated by 2 to 5 metres;
- preference should be given to smooth barked and evergreen trees;
- large discontinuities or gaps in vegetation should be provided to slow down or break the progress of fire towards buildings;
- shrubs should not be located under trees;
- shrubs should not form more than 10% ground cover;
- clumps of shrubs should be separated from exposed windows and doors by a distance of at least twice the height of the vegetation.
- grass should be kept mown (as a guide grass should be kept to no more than 100 mm in height); and
- leaves and vegetation debris should be removed.

1

Postal address

NSW Rural Fire Service
Locked Bag 17
GRANVILLE NSW 2142

Street address

NSW Rural Fire Service
4 Murray Rose Ave
SYDNEY OLYMPIC PARK NSW 2127

T (02) 8741 5555
F (02) 8741 5550
www.rfs.nsw.gov.au





2. Landscaping within the required asset protection zone must comply with Appendix 4 of *Planning for Bush Fire Protection 2019*. In this regard, the following principles are to be incorporated:

- A minimum 1 metre wide area (or to the property boundary where the setbacks are less than 1 metre), suitable for pedestrian traffic, must be provided around the immediate curtilage of the building;
- Planting is limited in the immediate vicinity of the building;
- Planting does not provide a continuous canopy to the building (i.e. trees or shrubs are isolated or located in small clusters);
- Landscape species are chosen to ensure tree canopy cover is less than 15% (IPA), and less than 30% (OPA) at maturity and trees do not touch or overhang buildings;
- Avoid species with rough fibrous bark, or which retain/shed bark in long strips or retain dead material in their canopies;
- Use smooth bark species of trees species which generally do not carry a fire up the bark into the crown;
- Avoid planting of deciduous species that may increase fuel at surface/ ground level (i.e. leaf litter);
- Avoid climbing species to walls and pergolas;
- Locate combustible materials such as woodchips/mulch, flammable fuel stores away from the building;
- Locate combustible structures such as garden sheds, pergolas and materials such as timber garden furniture away from the building; and
- Low flammability vegetation species are used.

Construction Standards

The intent of measures is to minimise the risk of bush fire attack and provide protection for emergency services personnel, residents and others assisting firefighting activities. To achieve this, the following conditions shall apply:

3. New construction must comply with Sections 3 and 5 (BAL 12.5) Australian Standard AS3959-2018 *Construction of buildings in bush fire-prone areas* or NASH Standard (1.7.14 updated) *National Standard Steel Framed Construction in Bushfire Areas – 2014* as appropriate and Section 7.5 of *Planning for Bush Fire Protection 2019*.

4. Fences and gates must comply with Section 7.6 of *Planning for Bush Fire Protection 2019*.

Property Access

The intent of measures is to minimise the risk of bush fire attack and provide protection for emergency services personnel, residents and others assisting fire fighting activities. To achieve this, the following conditions shall apply:

5. Property access roads must comply with the following requirements of Table 7.4a of *Planning for Bush Fire Protection 2019*:

- property access roads are two-wheel drive, all weather roads with minimum 4 metre carriageway width;
- a minimum vertical clearance of 4 metre to any overhanging obstructions, including tree branches;
- the capacity of road surfaces and any bridges/causeways is sufficient to carry fully loaded firefighting vehicles, bridges and causeways are to clearly indicate load rating.
- hydrants are provided in accordance with the relevant clauses of AS 2419.1:2021;
- there is suitable access for a Category 1 fire appliance to within 4 metre of the static water supply where no reticulated supply is available;
- property access must provide a suitable turning area in accordance with Appendix 3;
- curves have a minimum inner radius of 6 metre and are minimal in number to allow for rapid access and egress;



RFS



- the minimum distance between inner and outer curves is 6 metre;
- the crossfall is not more than 10 degrees;
- maximum grades for sealed roads do not exceed 15 degrees and not more than 10 degrees for unsealed roads; and
- a development comprising more than three dwellings has formalised access by dedication of a road and not by right of way.

Water and Utility Services

The intent of measures is to minimise the risk of bush fire attack and provide protection for emergency services personnel, residents and others assisting fire fighting activities. To achieve this, the following conditions shall apply:

6. The provision of water, electricity and gas must comply with the following in accordance with *Planning for Bush Fire Protection 2019*:

- reticulated water is to be provided to the development where available;
- fire hydrant, spacing, design and sizing complies with the relevant clauses of Australian Standard AS 2419.1:2021;
- hydrants are not located within any road carriageway;
- fire hydrant flows and pressures comply with the relevant clauses of AS 2419.1:2005;
- all above-ground water service pipes are metal, including and up to any taps;
- where practicable, electrical transmission lines are underground;
- where overhead, electrical transmission lines are proposed as follows:
 - a. lines are installed with short pole spacing (30 metres), unless crossing gullies, gorges or riparian areas; and
 - b. no part of a tree is closer to a power line than the distance set out in accordance with the specifications in *ISSC3 Guideline for Managing Vegetation Near Power Lines*.
- reticulated or bottled gas is installed and maintained in accordance with AS/NZS 1596:2014 and the requirements of relevant authorities, and metal piping is used;
- all fixed gas cylinders are kept clear of all flammable materials to a distance of 10 metres and shielded on the hazard side;
- connections to and from gas cylinders are metal; polymer-sheathed flexible gas supply lines are not used; and
- above-ground gas service pipes are metal, including and up to any outlets.

For any queries regarding this correspondence, please contact Rohini Belapurkar on 1300 NSW RFS.

Yours sincerely,

Kalpana Varghese
Manager Planning & Environment Services
Built & Natural Environment

Mr Chris Ritchie
A/Executive Director Energy and Resource Assessments
Department of Planning, Housing and Infrastructure

By email: [REDACTED]

Dear Mr Ritchie

**Moss Vale Plastics Recycling Facility (SSD-9409987)
Request for Information**

I am writing in response to your request for information from the Environment Protection Authority (EPA) on the above application currently before the Independent Planning Commission (Commission) for determination.

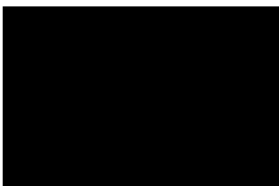
During the Commission's stakeholder meeting with Planning, NSW Health, EPA and Water NSW the following question was taken on notice by the EPA.

- a. EPA – The Commission heard a lot of concern from the community about environmental impacts arising from a potential fire. Has the EPA had any experiences with a similar event and resulting impacts?

Please find attached to this letter (Attachment A) our response to this question on notice.

If you have any further questions about this issue, please contact me on 4 [REDACTED]
[REDACTED]

Yours sincerely

A large black rectangular redaction box covering the signature of Peter Bloem.

09/01/2025

Peter Bloem
Manager Regulatory Operations

ATT. EPA response to Question on Notice

ATTACHMENT A : EPA RESPONSE TO QUESTION ON NOTICE

Waste fires can arise across all stages of the waste management chain including waste collection, transport, transfer stations, recycling and disposal at landfills. The source of combustible material can vary greatly and includes plastics, tyres, used oils, green waste, wood waste, solvents, batteries, municipal solid waste and so on. The cause of the fires in many cases can be unknown. Loose or imbedded lithium batteries are a common cause. A [2024 report](#) funded by waste and recycling bodies, estimates that there are between 10,000 and 12,000 battery-related fires in the waste and recycling sector nationally per year. Other causes can include gas bottles, chemical containers, spontaneous combustion or even suspected arson. In NSW these incidents can occur at facilities that are regulated by the EPA (under environment protection licences) or other facilities that do not hold such licences and are regulated by local government under the Protection of the Environment Operations Act 1997.

Waste fires can have several significant environmental impacts. The large amounts of combustible materials can lead to prolonged and intense fires that have the potential to cause significant harm to people and the environment through the release of hazardous chemicals to the atmosphere, surface waters and ground waters. The economic costs of these fires can be significant. This includes the incident response, clean up and recovery. It can also include the disruption to waste and recycling services provided to the community resulting from the incident. The Hazardous Waste Section of the Commonwealth Department of the Environment commissioned a [report](#) in 2016 to gain greater insight into the problem of waste fires in Australia.

Under the POEO Act 1997 there is a duty to notify the EPA of pollution incidents in NSW, including waste fires. Licensees are required to prepare pollution incident response management plans for each licensed activity. A primary EPA objective is to protect, restore and enhance the quality of the environment in NSW. To help achieve this objective, the EPA assists the responsible party in efforts to mitigate the impact of pollution incidents on the environment and surrounding community. When responding to a hazardous materials incident, the objective is to contain the hazardous materials to prevent actual or further harm to the public, property and the environment. The EPA supports and advises the combat agency (the agency responsible for controlling the response to an incident) which is typically an emergency service organisation such as Fire and Rescue NSW. The EPA works with other agencies to obtain satisfactory environmental outcomes. These can include NSW Health, Safework NSW and local councils.

Preventing and preparing for waste fires offers the best defence against the risk of injury, fatalities, property damage, environmental degradation and economic loss.

The fire risks for the proposed Moss Vale Plastic Recycling Facility development have been assessed and can be appropriately managed, subject to conditions. These include:

- Certification of the development under the EP&A (Development Certification and Fire Safety) Regulation 2021
- Waste plastic arrives at the premises pre-sorted in bales and subject to waste tracking, monitoring, record keeping and quality control. Non-conforming waste is removed, segregated and lawfully disposed of at an approved waste facility
- Limits on stockpile size & separation distances
- Provision of fire management infrastructure including fire sprinkler system, fire detection and alarm system, automatic smoke exhaust system and a building occupant warning system and a firewater containment system
- The preparation of a Fire Safety Study (FSS) prior to construction. The FSS would also include consideration of the operational capability of local fire agencies to respond to a fire, fire water containment, and an Emergency Plan to be prepared in consultation with FRNSW prior to commencement of operation.
- Incident notification, reporting and response
- Construction & Operational Environmental Management Plans
- Compliance reporting
- Auditing.

These provisions should cover the relevant aspects of the following documents:

- Department of Planning Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study Guidelines'
- New South Wales Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems (NSW HMPCC, 1994)
- FRNSW Fire Safety Guideline – Emergency Services Information Package and Tactical Fire Plans
- Department of Planning Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning'
- Department of Planning Hazardous and Offensive Development Application Guidelines – Applying SEPP 33

From: Anne O'Neill (Ministry of Health) [REDACTED]
Sent: Friday, 13 December 2024 9:23 AM
To: Sheelagh Laguna [REDACTED]
Cc: Emma Barnett [REDACTED]; Kishen Lachireddy [REDACTED]; Stephen Conaty (Ministry of Health) [REDACTED]; Kim Sutherland (Ministry of Health) [REDACTED]; [REDACTED]; Christopher Ritchie [REDACTED]; Kate McGregor (Ministry of Health) [REDACTED]
Subject: FW: Moss Vale Plastics Recycling Facility - Question on Notice

Dear Sheelagh – I am responding on behalf of NSW Health to your question on notice:

QoN:

- b. NSW Health – Can NSW Health please provide comment on the following statement from the submission from Garvan Institute of Medical Research and Australian BioResources Pty Ltd dated 2 December 2024:

“ABR is a one-of-a-kind facility in New South Wales, which is crucial to the achievement of the State’s health and medical research priorities in supporting research infrastructure (as per the NSW Office for Health and Medical Research)”

Response:

The ABR is owned and operated by the Garvan and it supplies mice nationally for research organisations through its breeding and housing facilities. They also provide services such as tissue banking and genotyping, plus support for exports and imports, both for NSW and nationally. The ABR is a significant facility in the national research ecosystem – and is one of a kind for the state. The issue with noise and vibration on mice is that they either stop breeding or eat their offspring – which is not a good outcome from an animal welfare perspective and would have a significant impact on supply to the state and nationally.

It should also be noted that leveraging and supporting NSW’s critical research infrastructure, such as the ABR, is a key component of the upcoming NSW Health Research and Innovation Strategy - particularly Strategic direction 3: An open assets philosophy - developing and mobilising assets to accelerate research and fully harness emerging innovations

Happy to discuss further if needed.

Kind regards,

Anne

Anne O'Neill FTSE
Director, Enterprise, International Partnerships and Clinical Trials
Office for Health and Medical Research

1 Reserve Road, St Leonards, New South Wales 2065

Tel [REDACTED] | Mob [REDACTED] | [REDACTED]

www.medicalresearch.nsw.gov.au | www.health.nsw.gov.au | [@MedResearchNSW](https://twitter.com/MedResearchNSW) | [in](https://www.linkedin.com/company/nsw-medical-research) [NSW Medical Research](https://www.linkedin.com/company/nsw-medical-research)

From: Stephen Conaty (Ministry of Health) [REDACTED]
Sent: Tuesday, 10 December 2024 6:58 AM
To: Kim Sutherland (Ministry of Health) [REDACTED]; Anne O'Neill (Ministry of Health) [REDACTED]
Cc: Kishen Lachireddy [REDACTED]
Subject: FW: Moss Vale Plastics Recycling Facility - Question on Notice

Dear Kim and Anne

A development in the Moss Vale area – a Plastics Recycling facility - has been referred to the Independent Planning Commission for determination. There have been a large number of submissions from the community objecting to the facility and I assume this was the main reason for referral. Many community concerns are around microplastics and other concerns for the environment and health.

The Commissioners held a meeting / hearing with agency representatives from NSW Health and the Environment Protection Authority last week. One matter that remains unresolved are concerns from Australian Bioresources Pty Ltd and the Garvan Institute of Medical Research. I don't know the relationship between these two entities however I presume that Australian Bioresources (located in the same area as the proposed plastics recycling facility) provide the Garvan Institute with animals for research (mice, rats). I understand that that ABR has expressed concerns about noise / vibration.

The Commissioners from the IPC I understand simply want to know whether ABR is a one of kind facility or how important it is for research infrastructure in the state.

I would be grateful if you could provide some brief points to Sheelagh Laguna (below) by mid next week and cc my colleague Kishen Lachireddy as I will be on leave. Alternatively send your comments directly to Kishen.

Kind Regards

Stephen Conaty

Director | Environmental Health Branch | Health Protection NSW
Mob: [REDACTED] Email: [REDACTED]

From: Sheelagh Laguna [REDACTED]
Sent: Monday, 9 December 2024 1:11 PM
To: Kishen Lachireddy [REDACTED]; Stephen Conaty (Ministry of Health)
[REDACTED]
Cc: Joanna Bakopanos [REDACTED] Christopher Ritchie
[REDACTED]; Emma Barnet [REDACTED]
Subject: Moss Vale Plastics Recycling Facility - Question on Notice

Hi Kishen and Stephen

Following our stakeholder meeting re the Moss Vale Plastic Recycling Facility last Tuesday, we have received a request from the IPC to provide a response from the NSW Health regarding a question that was taken on notice (see below).

- b. NSW Health – Can NSW Health please provide comment on the following statement from the submission from Garvan Institute of Medical Research and Australian BioResources Pty Ltd dated 2 December 2024:

“ABR is a one-of-a-kind facility in New South Wales, which is crucial to the achievement of the State’s health and medical research priorities in supporting research infrastructure (as per the NSW Office for Health and Medical Research)”

In terms of timing, it would be appreciated if you could provide this information to us by mid next week if possible so we can include it in a consolidated response.

If you have any questions or would like to discuss, please let me know.

Kind regards

Sheelagh Laguna
Principal Planner

Industry Assessments

Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street | Locked Bag 5022 | Parramatta NSW 2124
T [REDACTED] E [REDACTED]



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