New South Wales Government
Independent Planning Commission

CHRIS GRANGE		**OBJECT**	Submission ID: 216951
Organisation:	*N/A*	Key issues:	*Social impacts,Land use compatibility (surrounding land uses),Traffic,Other issues*
Location:	*New South Wales 2577*		
Attachment:	*Attached overleaf*		

Submission date: 11/22/2024 8:44:00 AM

It is hard to believe that in 2024, we have to write a submission to object against a project which actually increases pollution.

If this monstrosity of a development is approved, it will destroy not only Moss Vale as a town, but also Sydney's drinking water. I cannot believe that in this day and age, knowing what we know about PFAS, PFOS and microplastics, that this project can be considered anywhere near densely populated areas. Let alone in Sydney's drinking water catchment.

Further, there are multiple schools less than 2kms from this proposed development. With the forecasted expected air pollution, the children will not be allowed to play outside. Any child living in this area will then go home and again not be allowed to play outside. This is ridiculous and no child should be subject to such conditions.

Make no mistake, there is no way to monitor the type of plastics recycled or refined; where these plastics originate (AU or Worldwide), and what is in them (PFAS, BPA etc etc etc). Humanity is still learning about 'forever chemicals' such as PFAS/ PFOS.

Whilst the Plasrefine site is proposing to pump all wastewater into the sewage water system, does the Moss Vale water treatment facility have the capacity and or ability to process this PFAS and micropastics polluted water? What and where is any sludge or biosolids dispersed too? Over farmland? Meaning when it rains, the PFAS in the waste goes back into streams and drinking water. Wherever its dispersed, PFAS is a forever chemical. It doesn't break down over years. Meaning that we are just moving the problem into another area. Having read the Moss Vale Sewage Treatment Plant Upgrade document, its not clear to me that any of these questions are answered. Surprisingly, Microplastics are not even mentioned in this document.

Let's get some common sense introduced here and reject this proposal.

Key Points to Consider for IPC Submissions

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Edited & Endorsed by Moss Vale Matters

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I/we object to the proposed plastic recycling refinery in Moss Vale on the following grounds:

1. Too close to residential areas (within approx 200 metres) – high risk of human, residential and animal/wildlife loss in event of fire.
2. Too close to the Garvan Institute (the ABR – Australian BioResources facility), only 50m away – high risk to human and animal loss in event of fire, noise and vibration may disrupt the breeding cycle of the research mice. (The ABR is a world class state-of-the art facility for breeding and holding mice critical for medical research into the fields of cancer, mental illness, arthritis, asthma, heart disease, diabetes, obesity and genetic conditions.)
3. Too close to schools, with several schools and childcare centres within an approx 2 km radius. Potential risk/harm to human health in event of fire/explosion, failure of water/air filtration processes.
4. Increased heavy vehicle traffic creating noise pollution, air pollution, dust, vibration, potential accidents, potential fatalities of wildlife, potential importation of weeds from other areas, increased degradation of roads.
5. Increased vehicular traffic from worker light vehicles entering and exiting the site creating noise, dust, potential accidents, vibration, etc.
6. Potential environmental impact of air pollution from the ‘stacks’ (or vents) that may be released from the ventilation system in the event of a malfunction/failure of the current air filtration processes. In the event of a failure of process, these fumes could include volatile organic compounds (VOCs) or other hazardous toxins that may be harmful to health.
7. Removal of habitat for the microbat recorded by the EPA – this bat is on the red list for endangered species.
8. Too close to riparian zones – only 10m approx, either side of the building, to streams that feed into the Wingecarribee River. Potential water run-off containing microplastics may enter the Wingecarribee River, which feeds into the Warragamba Dam (which provides Sydney and Goulburn’s drinking water). Greatest risk may be from failure of water filtration processes. Uncertain long-term risk of microplastics but certainly theoretical potential for multiple medical health issues.
9. Potential disturbance to platypus habitats during building and operation of site. Run-off may increase water sedimentation and cause riverbank erosion diminishing habitat of local downstream platypus. A state government grant of $500,000 to Wingecarribee Shire

Council was recently received to monitor and collect data on our platypus population, another endangered species (Southern Highlands Platypus Conservation Project).

10. Other potential biodiversity loss includes removal of tableland swamp meadows, removal of mountain grey gums, removal of habitat for southern myotis and large bent winged bat – listed as endangered and vulnerable, respectively. Other direct and indirect impacts due to vegetation removal on birds, insects, frogs, reptiles, koalas and kangaroos, and eastern long necked turtle (*chelodina longicollis*).

11. Plastic recycling refineries are *usually* classed as heavy industrial, due to risk of air/water pollution in event of failure of safety processes and extremely high fire risk. There have been over 19 devastating fires associated with plastics facilities since 2019 in Australia alone. The question of fire is not if, but when.

12. It should not be placed in an area renowned for its viticulture, agritourism and close to the most preserved Georgian village (Berrima) on mainland Australia. It will be detrimental to the local tourist industry.

13. It should not be in the Southern Highlands Innovation Park (SHIP) precinct. This future developmental area is earmarked for biotech industries, research, agri-research, light industry and the like, and is set to become a major economic driver for our shire and future employment. It will be detrimental to the long-term plan for the SHIP as it will deter the SHIP from attracting innovative, sustainable businesses (particularly in the Research & Advanced Manufacturing sub-precinct) who will not desire to set up next to a factory with potential huge fire risk, large numbers of heavy vehicles coming & going on the shared roads and potential air/water contamination in the event of failed filtration processes.

14. Our local fire services are very small. Moss Vale station is unmanned and entirely voluntary, with only one fire truck. There are only 4 trucks and 1 hazmat vehicle in the Highlands – others are 76km away at Campbelltown (50 mins in no traffic), Goulburn (45 mins in no traffic) or further at Shellharbour.

15. The fires that occur in these facilities are *common* with temperatures reaching ~1000 degrees centigrade (see information on Hume, ACT fire in December 2022). It is usual for much smaller facilities to require 80+ firefighters, 15 pump trucks and 6 hazmat vehicles and still they are unable to extinguish them, having to let them burn out in their own time – meanwhile with toxic plumes billowing for days. In the interim, residents, schools and businesses must evacuate due to the thick black toxic fumes and smoke which is hazardous to health, if not potentially lethal. Fires fuelled by plastic waste may release dioxins, benzene, hydrogen cyanide, cyanide, chlorine, carbon monoxide and VOCs into the environment. Breathing in these fumes has the potential to cause asthma deaths, potential sarcoidosis, cancer, nervous system disorders, genetic impacts, developmental impacts, leukaemia and reproductive disorders down the time-line. This is of particular impact to vulnerable (elderly and very young) and those with respiratory illnesses.

16. Chemicals in plastic are potent environmental pollutants – how will these emissions be safely monitored? What will be done if they are found to be over safe limits?

17. The safe acceptability limit for Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) in drinking water is currently being reviewed in many countries around the world. The NHMRC (National Health and Medical Research Council) is the Australian Government's primary

health and medical research funding agency – it is critical in influencing policy decisions made by the federal and state governments of Australia. The NHMRC recently released proposed new drinking water guidelines for public consultation, which recommend lower values for PFAS in drinking water across Australia, which the NSW Government has welcomed (NSW Government welcomes NHMRC proposed guidelines on drinking water and PFAS | NSW Government).

18. Do residents have to live with odours which may be carried by winds as far as Bowral, Berrima and beyond?

19. Psychological impacts and property devaluation – the proposed buildings will be the size of Bunnings stores and there is no buffer zone for the nearby residents. This will have a negative impact on their property values and enjoyment of their properties, potentially causing stress and subsequent mental health issues. The plastic recycling refinery in Parkes NSW *has a buffer zone of at least 7km.*

20. Human rights – it is a basic human right to have access to a clean, healthy and sustainable environment. Australia was, until recently, the only liberal democracy in the world that did not have a national act to protect its citizens' basic rights. However, in an Australian first, a new human rights (healthy environment) amendment bill to the legislative assembly was passed on 26 October 2023. This law obligates the government to address harm and to fulfil the rights to health, clean air, safe water, non-toxic environments to live in and a healthy ecosystem. Other states will follow. How will the NSW State government address this seemingly paradoxical issue – will it close Plasrefine once it has already been built? A copy of the bill and the explanatory statement is available at https://www.legislation.act.gov.au/b/db_68569/

21. When the recycling facility closes, will Plasrefine remediate the land at their cost or do we the taxpayer's have to foot the bill twice, once to set it up and secondly to clean it up?

22. In terms of safety, being approx. 200m from residential homes, 50m from the ABR and 10m away from key riparian zones is too close – THIS IS SIMPLY NOT THE RIGHT SITE from a risk perspective.

23. Plastics can generally only be recycled 2-3 times, with increasing hazardous chemicals building up with each recycling process. At the end of this 2-3 x cycle, plastics will end up in landfill (so recycling is not a good long-term solution, as it only delays the landfill issue).

24. We should focus on reducing plastic waste by rejecting plastic packaging in the first place – putting pressure on large supermarket chains, the government and companies to reduce plastic packaging at the core of the issue. This is actually where the government needs to focus their attentions, not by allowing millions of plastic bottles/packaging to be produced with no good solution for dealing with the consequences.

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