New South Wales Government
Independent Planning Commission

NAME REDACTED		OBJECT	Submission ID: 218375
Organisation:	*N/A*	Key issues:	*Social impacts,Visual impacts, design and landscaping,Land use compatibility (surrounding land uses),Traffic*
Location:	*New South Wales 2577*		
Attachment:	*N/A*		

Submission date: 11/25/2024 3:29:46 PM

Dear Commissioners,

I am writing to express my strong objection to the recommended approval of the Plasrefine Recycling Pty Ltd proposal for a plastic recycling facility in Moss Vale (SSD 9409987). My objection is based on several critical concerns that have not been adequately addressed in the proposal or the assessment process and therefore does not to allow consideration of the essential matters required by s.4.15(1)(b) of the Environmental Planning and Assessment Act 1979 (NSW) (œthe EP&A Act).

Lack of Baseline Data for Wastewater and Microplastics

The EIS fails to provide sufficient baseline data the existing environment specifically in regard to wastewater and microplastic contamination. This omission is particularly concerning given the significant environmental implications of plastic recycling facilities. Studies have shown that wastewater treatment plants can be major sources of microplastic pollution. Without proper baseline data to allow consideration of the essential matters required by s.4.15(1)(b) of the Environmental Planning and Assessment Act 1979 (NSW) (œthe EP&A Act) in relation to the potential air, terrestrial, aquatic and sewer emissions of microplastics from the proposal, and the associated human-health and environmental risks arising from those emissions it is impossible to accurately assess the potential impact of the Plasrefine facility.

Ecologically Sustainable Development (ESD) Precautionary Principle

The proposal does not adequately address the ESD precautionary principle, particularly concerning the unknown impacts of MP2.5 particulate matter composed of microplastics. The precautionary principle is crucial when dealing with emerging contaminants like microplastics, where the full extent of environmental and health impacts is not yet fully understood. Given the persistence of microplastics in the environment and the lack of feasible cleanup options, a precautionary approach is essential.

Absence of Human Health Risk Assessment

A glaring omission in the proposal is the lack of a comprehensive human health risk assessment. This is particularly alarming given the growing body of evidence suggesting potential health hazards associated with microplastic exposure. Recent studies have indicated that exposure to microplastics can induce a variety of toxic effects, including oxidative stress, DNA damage, organ dysfunction, and metabolic disorders. Furthermore, epidemiological evidence suggests that chronic diseases may be related to microplastic exposure.

Environmental Concerns

The proposed facility would have the capacity to process up to 120,000 tonnes of plastic waste per annum. While recycling is generally beneficial, the scale of this operation raises concerns about potential environmental impacts, particularly regarding microplastic pollution. The amendment report mentions reduced water demand and wastewater discharge, but without proper baseline data and ongoing monitoring, it is impossible to verify these claims or assess their long-term implications.

Inadequate Risk Assessment Framework

The current approach to assessing the risks of microplastic pollution is inadequate. Experts recommend a precautionary framework that focuses on assessing microplastic exposure data to characterise and rank risks. This framework should prioritize high-risk components such as microfibers and fragments, which are likely to be prevalent in a plastic recycling facility.

Conclusion

In light of these significant concerns, I strongly urge the relevant authorities to reconsider the recommended approval of the Plasrefine proposal. At a minimum, the following actions should be taken before any approval is considered:

1. Conduct comprehensive baseline studies on wastewater and microplastic contamination in the affected area.

2. Implement a rigorous human health risk assessment, considering both direct and indirect exposure pathways.

3. Apply the ESD precautionary principle more stringently, given the unknown long-term impacts of microplastic pollution.

4. Develop and implement a robust monitoring and mitigation plan for microplastic emissions.

Until these critical issues are adequately addressed, the approval of this facility poses unacceptable risks to both environmental and human health and should be REFUSED.

thank you for your time.