

Ms Emma Barnet

Infrastructure and Industry Assessments

NSW Department of Planning and Environment

GPO Box 39 SYDNEY

NSW 2001

RE: SSD - 9409987 Moss Vale Plastics Recycling Facility

Dear Ms Barnet,

I would like to register my vehement opposition and concerns regarding the plastic waste facility, Plasrefine, proposed for the township of Moss Vale, for the following extensive list of reasons:

- First and foremost, is the fact that GHD/Plasrefine have pinned all their hopes on the proposed new access route, on land that is owned by Council. They DO NOT have landowners' consent, which was a specific prerequisite of their DA and therefore, it should never have progressed this far. By their own admission in **Technical Report 6 - Traffic and Transport** P. 32 states...Option 3. North-South Connection with Douglas Rd During discussions with the Council, it became evident that this option was the least favoured. The primary concern revolves around the necessity for heavy vehicles to execute a hook turn across a level rail crossing associated with the Berrima Branch Line. This concern aligns with the broader issue of level crossing safety as outlined in the guidelines of Transport for NSW and the National Railway Level Crossing Safety Strategy 2010-2020, which highlights the significant road safety risk associated with train-vehicle collisions at level crossings. It would seem that the new proposal magically negates all of these safety issues, although they would be of great concern for all the businesses that have established themselves in the new Redfields Road and their associated vehicles accessing the site as part of the SHIP complex. Those safety issues have now been transferred elsewhere, which illustrates GHD/Plasrefine's total disregard for the welfare of the community.
- Secondly, their new access route, involves the highly dangerous, costly and almost impossible idea that the rail crossing could be moved 190m west of its current location. This serious miscalculation could only have been achieved through a desktop analysis, as was conducted for the previous access route along Innes Road through the school zones. There is no possibility that any articulated vehicle, heavy or otherwise, could navigate across the 'new rail crossing' as the rail line at that location is 1.2m above ground level, something which could have been easily determined from an onsite inspection.
- The site is only 150 - 200 metres from residential homes described in the Environmental Impact Statement, as 'sensitive receivers' It is less than 1 km from an Early Childhood Centre, 2kms to local schools and 2kms to two very large schools in Bowral. Worse still, boundary to boundary, it is only 30 metres distant from the Australian Bio Resources facility – the Garvan Institute. There is NO buffer zone. The location is only 2.17kms from the old GPO in Argyle Street Moss Vale, despite claims by GHD that it is 3kms and outside the town boundary. It is also within close proximity to local vineyards and winemakers which make a significant contribution the Southern Highlands economy.
- Up to 120,000 tonnes of plastic waste will be removed from Sydney, Wollongong, Canberra, Melbourne and trucked into Moss Vale. We will be the dumping ground guinea pigs for the second largest plastic waste disposal factory in Australia, with all the associated disadvantages and no real advantages to our community.
- The stated 'benefits' of supposed dollars to the economy and employment opportunities are highly questionable. Local employment agencies have been struggling for some time, to fill local job vacancies, so if the 140 full time positions cannot be filled locally, will they be sourced from China? If the factory is to be fully automated, as proposed, what type of jobs would these vacancies entail – cleaning, driving etc?
- Degradation of local roads, due to the excessive heavy haulage vehicle usage 24/7, at a considerable cost to Council and subsequently taxpayers. for a proposal WE DON'T WANT. GHD projects a 2% traffic volume increase

is ridiculous. 240 light vehicle movements with no qualifying statement as to what constitutes a light vehicle. The total, therefore, will be 340 vehicle movements DAILY, on our roads and through our town.

- Who will co-ordinate these traffic movements to ensure that drivers on a tight timetable, will adhere to the suggested routes, timetables, number of vehicles? When coming from all over Australia, how is this even possible?
- The inevitable contamination of Sydney's drinking water and the category two riparian zone, is an unacceptable risk to millions. The factory also DOES NOT allow for the required buffer of 20m for the riparian zone, only 10m which is already an unacceptable risk. It is simply not the right site.
- No specified plan for the safe removal of 9,000 tonnes of dewatered sludge and no destination. GHD making it up as they go along, just like their FOUR attempts at providing an access route to their landlocked site.
- Their stated reduced daily water requirements are still excessive (5,500lts – 15,500lts) and grossly unfair for residents who will be subject to restrictions during drought times, while Plasrefine will be exempt. The reduction in water also means a corresponding increase in the concentration level of contaminants.
- Transfer of huge quantities of wastewater contaminated with microplastics into our sewer system not yet upgraded to cope with the additional load. GHD claims to be able to filter these out with technology yet to be proven and tested in Australia. They state that the MV sewerage treatment plant will screen the rest. This is impossible with particles that are so small as to be microscopic and invisible to the naked eye. They will also transfer to truck tyres from the factory and exit out to the environment.
- The proposed green washing liquid to be used in the process, is an agricultural wash, that Mr Lyu has patented in China and is applied to pigs and chickens, NOT plastic recycling. It also contains eucalyptus oil which is highly combustible. Mr Lyu has already been fined and censured by the Chinese Govt. for pollution and building code breaches. How can the community put any trust in the management of this facility, given his admitted lack of experience in plastic recycling and these serious breaches? Both he and his niece, Nanxi Zheng, the director, stated that they have only 'visited' plastics recycling facilities in China.
- There is far too much reliance on designs and compliance regulations that are intended to be finalised AFTER approval, which will be far too late. A facility that is classified as State Significant should be compelled to supply far more intricate and accurate details than have been provided to date. There are too many contradictory 'facts,' figures and open-ended statements which simply don't stack up.
- Why is it that an SSD like Plasrefine seems to be permitted to gloss over specific requirements that any ordinary citizen would be compelled to address in a standard DA? For example: Cut and fill – no measurements or explanation, rainwater tanks with no cubic capacity, wastewater.
- The amount of material to be stored inside the factory is simply staggering. A total of 9,600 m³, 4m in height. This could undoubtedly provide an ignition source triggering a massive uncontrollable factory fire. The highly toxic emissions which would emanate from such a blaze could prove catastrophic. A huge blaze that erupted in a plastic recycling facility in Indiana this year, resulted in the release of carcinogenic emissions such as hydrogen cyanide, carbon monoxide, benzene and volatile organic compounds. Over 2,000 residents were evacuated for days. How could we possibly evacuate the Highlands in such an emergency? It would completely decimate the Garvan Institute and its sensitive mouse environment situated so close by. Additionally, our community does not have sufficient specialised equipment to fight such a fire. Our nearest brigades equipped to battle a full-scale chemical/plastics factory fire, are approximately 45 m away, if they available units and if they could be despatched immediately. Meanwhile, Moss Vale burns.

Some of the statements contained in **Appendix C – Updated Mitigation Measures**, are not only fanciful but laughable. Included below, is a selection of the most questionable and ludicrous:

Water quality impacts during operation - The plan would also include daily visual inspection by a specified person(s) of the plastics recycling and reprocessing facility site for plastic waste or litter. **How do they propose to find microscopic particles?**

Soils and Water - Where a discharge of greater than 50 mg/L of suspended solids occurs when the design rainfall event has not been exceeded this would be considered a non-compliance and remedial action taken. **What is this action – no details.**

Noise and vibration - Managing the potential for noise and vibration impacts during construction: A construction noise and vibration management plan would be developed after the construction contractor has been engaged and a detailed construction method has been developed. The plan would be based on the construction contractor's method and include a detailed examination of feasible and reasonable work practices and noise mitigation measures to manage sensitive receivers that are predicted to be 'noise affected.' This would also include a community consultation plan to liaise with the noise affected receivers. **A series of previous community consultation efforts by GHD were farcical. Why would these prove any different? Our community has absolutely no faith in the ability of the proponent to genuinely engage with residents. There have been merely token gestures and a 'forced' SIA to date, which does nothing to instil confidence in their assurances.**

Urban design and visual Visual amenity: **Seed collection** of local provenance species would be undertaken for use in the revegetation. **The area has a substantial rabbit population which should enjoy all those seedlings once they begin to sprout.**

Lighting: the use of eco lighting and, where appropriate, the use of directional luminaires, shields and baffles to minimise sky glow and light spill for surrounding rural residential properties. **How could this possibly be effective in a visually rural area with glare/glow/luminescence from 180 pole and wall mounted lights, up to 20m high?**

Greenhouse gas Greenhouse gas emissions during operation: More efficient equipment and lighting **would be investigated** during detailed design. **This does not mention any consideration for implementation, only investigation. If GHD/Plasrefine's track record is any indicator, investigation IF it is conducted, would be the extent. There is no requirement for implementation and no details.**

Socio-economic Social impacts, communication and engagement: A Community and Stakeholder Engagement Plan (CSEP) will be prepared to guide ongoing consultation with the community in order to build relationships and a sense of trust and allow community members to share their concerns and gain relevant project information. The CSEP will help to ensure that:

- The community and stakeholders have a high level of awareness of all processes and activities.
- Accurate and accessible information is made available.
- A timely response is given to issues and concerns raised by the community.
- Feedback from the community is encouraged.
- Opportunities for input are provided

This is completely laughable. GHD/Plasrefine have a proven track record for abysmally controlling and manipulating all previous community engagement sessions, until residents were forced to request intervention by Wendy Tuckerman MP. GHD had to be forced into conducting their SIA, because it was a SEARS requirement, which they initially determined as unnecessary. A purely contemptuous attitude.

A Communications and Engagement Strategy (CES) will:

include strategies to promote community understanding and awareness of real and perceived health and wellbeing impacts. **Interesting terminology used in this statement.**

Include ongoing engagement to identify potential health and wellbeing impacts and work out mitigation techniques if appropriate and/or required. **Who determines whether or not these measures are appropriate or required?**

offer Employee Assistance Program services for existing community members with medically diagnosed significant levels of distress and/or anxiety demonstrated by a medical practitioner to be directly related to the project. This service will be available to those directly impacted, along the haulage route and adjacent to the proposal site, up to and including the first year of operation. **Surely the very suggestion that this service may be required, is an admission of an inappropriate development on this site.**

Waste management Operational waste management: An operational waste management plan would be developed and implemented...this would include: – Details of off-site recycling and disposal locations **and yet there are no details provided in their proposal. Everything is AFTER the event. AFTER approval.**

Operation Air quality Operational air emissions: **Once operational**, sampling of the proposal operational emissions would be conducted. An air monitoring program would be established.... Sampling would be undertaken in each building **biannually** by a suitable professional. **Plasrefine will ONLY take air samples TWICE yearly? So, for the remainder of the year, workers, drivers, visitors etc. would be exposed to potential contaminants? This is truly alarming!**

To maintain dust levels within both Building 1 and Building 2, regular sweeping and housekeeping practices would be undertaken. No activities, including stockpiling, would occur external to buildings. Building doors would remain closed at all times except when allowing vehicles to enter or exit. **They intend to conduct regular sweeping for contaminants and microplastics? This is extremely concerning, especially with their so called fast acting roller doors, opening and closing for vehicles entering and exiting.**

Greenhouse gas Greenhouse gas emissions reporting obligations: Annual monitoring and reporting of greenhouse gas emissions... will be undertaken should Plasrefine Recycling meet the triggers for reporting. **Yet another cause for concern.**

The following statement by GHD contained on the front page of the Technical Report 6 – Traffic and Transport, is also cause for alarm....**"Site conditions (including the presence of hazardous substances and/or site contamination) may change after the date of this Report. GHD does not accept responsibility arising from, or in connection with, any change to the site conditions. GHD is also not responsible for updating this report if the site conditions change."** So as residents, we are expected to accept this disclaimer from GHD for unknown consequences that could result from site construction issues. Does that mean therefore that Plasrefine will accept responsibility for such an occurrence? Highly questionable. **Why does GHD feel it necessary to litter their inhouse reports with such disclaimers? Effectively, they are indemnifying themselves from all responsibility that we, the community are expected to accept for the anticipated 25+ years of operation.**

Throughout the various EIS reports, many of which contain conflicting information and inaccurate calculations, the community is expected to rely on assurances from a company which has done nothing to date to foster cooperation, empathy, nor understanding amongst residents. On the contrary, residents have been treated contemptuously and have become increasingly alarmed and suspicious, resulting from the constantly evolving assurances and changing information provided by the proponent. Community engagement sessions have been carefully engineered to eliminate opposition as much as possible. Although GHD has given the 'appearance' of accommodating community concerns and answering questions, carefully micromanaged events have been the order of the day, a virtual smoke and mirrors token effort.

In conclusion, it is obvious that Australia is in urgent need of solutions to the increasing problem of plastic waste. However, the location for such an enterprise as the Plasrefine proposal, in the heart of the Southern Highlands, on a landlocked site, is simply not the right site and the application, without landowner's consent, under the terms of due process, needs to be refused. We have been battling this proposal for the past three years. There have been more than 328 submissions previously lodged, including WSC, ABS/Garvan and various businesses, almost 6,000 signatories to a petition mentioned in Parliament, all objecting to the proposal. Our community has made representations via Wendy Tuckerman MP and other political representatives, all voicing concerns, outrage and disbelief and yet the 'process' continues, when it quite clearly contravenes the very rules put in place to prevent such a debacle. I am at a loss to understand how this proponent and this proposal have gained such traction and proceeded unabated to this stage. I am hopeful however, that our community concerns and collective voices, will finally result in the only possible result that truly considers community and environmental concerns and wishes. 74-76 Beaconsfield Road Moss Vale, is not the right site for Plasrefine.

Kind Regards,



Kennedy Bird.