

Ingrid Skirka

I consent to share my name in this Objection Submission to;

EXHIBITION OF AMENDED STATE SIGNIFICANT DEVELOPMENT APPLICATION

Application No SSD-9409987

Moss Vale Plastics Recycling and Storage Facility Amended Application

Proposed Location 74-76 Beaconsfield Road, Moss Vale (Part Lot 11 DP 1084421)

Applicant Plasrefine Recycling Pty Ltd

Council Area Wingecarribee Shire

Following is a summary of some objections to Application No SSD-9409987 a
comprehensive document including supporting evidence
is available on request to the
Environmental Defender's Office.

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ADDRESS TO:

Emma Barnet

Industry Assessments

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I give consent for my name to be published:

Ingrid Skirka

I have not made a political donation; I acknowledge and accept the Department's disclaimer and declaration.

The following objection submission contains my personal objection with accompanying reasons to Application No SSD-9409987

There is no place in the management of modern water systems, for the protection of Indigenous spiritual values, although there should be. The recorded and oral Dreaming stories from the Southern Highlands centre around the complex system of rivers formed by Gurrungutch, the great eel. Gundungurra Elder Aunty Val (Velma Mulcahy OAM 1935-2022), loved to tell my son and I stories of how Gurrungutch was chased by Mirrigan the cat like quoll, the length of the Wingecarribee River, all the way up to the Cox's River in the Blue Mountains. The rivers were formed by the movement of the great Burringiling, pushing up earth to form the river banks, and creating the water landscapes that eels love, the riparian water landscape in the Whites Creek Catchment in Moss Vale, is one. I acknowledge the custodians of the Gundungurra, and the Elders past present and emerging. 128/185 of Aboriginal Cultural Heritage Assessment Report (ACHAR) by Biosis claims "There are currently no recorded mythological stories for the study area." One reason for my objection is the irreverent ACHA process staged by Application No SSD-9409987 and their third parties, which resulted in the excavation, bagging and transporting of sensitive cultural artefacts from the watercourse site that had survived millennia, belonging to the ancestors of Moss Vale Gundungurra being put in plastic bags in storage 498km off Country, then claimed in their paperwork "these sites no longer have cultural heritage value as the artefacts have been removed from the landscape during the test excavations." I acknowledge the Gundungurra, in this case it was Aunty T who'd turned up at the proposed site, on her way to maintain her spiritual and cultural connection to this and other local sacred places including Glow Worm Glen further along the Eastern side of the Warragamba Catchment. Aunty had just heard (2023) about the proposal to build on the waterway landscape she referred to as "Mother" and was keen to visit the water resource for herself, but was confronted by a chained and locked gate across the public's Braddon Road. Council had not approved the blockade of this public access. The somewhat haughty approach to the ACHAR conducted

in 2021 during covid times, where First Nation's people were particularly vulnerable, self-isolating, contemplating or awaiting the first Covid-19 vaccine doses administered in Australia. GHD proceeded to send a series of mass emails starting 13/04/2021 from a data base of people, the majority being Saltwater people from Shoalhaven, Illawarra and Sydney and beyond during a period when Sydney and surrounds were about to temporarily reintroduce mask-wearing and imposed limits on visitors to the home. A great majority Freshwater Gundungurra Elders were still unaware of the proposed development which had an invitation in the classifieds of the local subscriber paper 21/4/2021 in which I observe progress bias wording presented the development as positive reality, not an Application Proposal inviting community consultation built on the principles of early and meaningful community engagement.

I am Ingrid Skirka I have lived in the Southern Highlands for decades and now reside in Moss Vale which is on the Eastern edge of the 9050 sq km Warragamba Dam Catchment, it's a vital part of the Sydney Water Catchment Area, despite the breadth of the authority's combined catchment (16,000 sq km) a deluge in the Southern Highlands has the potential to make a huge difference to the amount of water in the storage system which supplies about 1.5 billion litres of drinking water a day, to over 5.3 million households and businesses. About 80% of clean water comes from Warragamba Dam, the rest comes from a mix of other dams (Hawkesbury–Nepean River and Sydney Desalination Plant). When the Authority ensures there is enough, steady water that flows through the system, at a regular rate, so as not to disturb the ecological habitats, such as the often-sighted local cadaverous long finned eel (*Anguilla reinhardtii*) or the Wingecarribee River resident platypus (which I witnessed a family group playing in the river at Berrima when it was swollen in the flood of 1978) the Moss Vale region is in the Whites Creek Catchment, with its long-term average of a 200-millimetre month about one month in every 15, it is central when it rains. Rain falling in Moss Vale, Medway, Burradoo and Bowral feeds Warragamba Dam, if it falls five kilometres South of Moss Vale it flows to the system's Shoalhaven Catchment, the water captured higher in the Wingecarribee River supplies the Southern Highlands from the reservoir and also supplies Goulburn via a pipeline in times of drought. The Moss Vale Whites Creek Catchment resource is a beginning point on the rim, which forms the rainfall receptacle for three cities.

The lack of detail on the water processes outputs in the GHD EIS is of grave concern and poses a high risk to the quality of water at source that would flow into the largest receptacle Warragamba Dam. There are several threats and unacceptable risks posed by Application No SSD-9409987; toxic plastic dust across the length of the Wingecarribee River, plastic nanoparticle contaminated sludge, food security, noise, air and light pollution, agricultural land pollutants, health challenges for livestock, wildlife and humans across the Shire. Early indications point to rivers as pivotal conduits and hotspots of plastic pollution, a "significant amount of plastic is transported through river catchments (Lebreton et al., 2017). The residence time of plastics in streams, rivers and lakes, could act as plastic "traps" that then increase organism exposure." Application SSD-9409987 proposal risks making the source water from lovely, tourist mecca Moss Vale a generational plastic trap contaminant for the Sydney Water Catchment, it's an unacceptable risk for the rainfall rim that is of National importance and a truly beautiful meandering river which in Gundungurra language means "waters to rest beside."

The EIS produced by employee owned GHD reports and conclusions are not consistent with the requirements of the Environmental Planning and Assessment Regulation 2000 or the intent of SEARS. By seeking to avoid liability should an erroneous EIS lead to harm to other parties Application SSD-9409987 demonstrates a high risk, the proponent and their agents must first be assiduous in the care they take to ensure the EIS is wholly accurate, comprehensive, and in no way misleading. Where an EIS is solely for

use by the client, that would seem to rule out any responsibility for use of the report by the Department of Planning and Environment.

“GHD otherwise disclaims responsibility to any person other than Plasrefine Recycling arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible...The opinions, conclusions and any recommendations in this report are based on assumptions made by GHD described in this report. GHD disclaims liability arising from any of the assumptions being incorrect.”

Assumptions are not a validation of reality; I believe the wording GHD has used is vexatious and vacuous for advantage, which gives me little faith in the validity of any mitigations referred to in their reports.

As the Proponent has several environmental violations in China which demonstrate a business culture of noncompliance or a deficit of regard for regulations (most recently 2023), a perusal of documents available from ASIC will indicate the Proponent positioning themselves with the benefit of limited liability, which concerns me in the case of successful future fire, flood or failure from the Application. I am concerned that the proponent has mortgaged with an Australian bank, unsuitable land with low cost being the prime driving factor, for Application No SSD-9409987, which displays a lack of care, scientific understanding, and appreciation of the local environment, its flora, fauna, agricultural and tourism (agritourism) businesses, vital water networks, neighbouring World class industry reliant on a clean environment as a criteria for operations (The Australian BioResources Pty Ltd), limited local infrastructure (such as sewerage works, fire services and rural roads not designated for heavy industry), and legal rights of residents by proposing such a development on riparian land between Whites Creek and the Wingecarribee River, which is a floodplain, with the expectation of removing the natural watercourse and directing the two rivulets either side of a visual blight, an enormous eight acre 15.5 meter tall building, the majority of which will be storing toxic, plastic, biohazard waste, with some factory area committed to the heat, beat and treat plastic pelleting industry. I am concerned that according to the amendments pollutants would be promulgated across the Shire by a 22m stack, liquid contaminants discharged into local sewerage or Catchment, transport vehicles (19-26 m semi-trailer truckloads 55 trucks per day), and industrial fan dispersion. It's a representation of a hazardous industry colliding with poor urban planning, being only 200 m from residential housing and new housing developments, dangerously close to tender age childhood facilities, local primary and secondary schools and the townships of Moss Vale, Burradoo and New Berrima.

I object to the proposal because it's an outdated, polluting industry, which destroys clean air and water, ecosystems and health and is a representation of unintelligent industrial planning, displaying a lack of comprehension or analysis of science. GHD data is weak or incomplete where they have not provided serious serviceable figures on personnel or resource requirements for a petrochemical waste facility fire in their EIS. I'm extremely concerned that the Wingecarribee area has limited resources in the event of combustion, petrochemical waste burns at high temperatures, heavy metals and dioxins are also released. The location of the proposal, is completely unsuited to such a hazardous and potentially toxic, fire prone industry as it is unconscionably close to residents. A General Industrial zoning is not appropriate for a hazardous industry such that Application SSD-9409987 proposes. Classification to hazardous is sought for such industry in the wake of fires which have become common occurrences and in line with current scientific research on microplastic, its toxicity to human health and the environment.

I am concerned in regards to flood disaster management and GHD comprehension of basic baseline data. GHD attempts to mislead and minimise the riparian landscape, floodplain site and proposed location of Application SSD-9409987 between Wingecarribee River and Whites Creek by naming the event

“a hundred-year flood.”

A 1:100 flood risk does not mean that a property floods once every 100 years, it means that there is a 1% chance of that type of flooding occurring in the next year, major floods can still occur in close succession over a few years. If you live in a 1% Annual Exceedance Probability (AEP) flood zone, you have a 50% chance of being flooded in a typical lifetime (70 years), and a 15% chance of being flooded twice in this period. As the climate continues to change, existing flood zones are likely to expand and expose more property and assets as well as increasing the depth of floodwater in currently exposed properties.

The Whites Creek catchment is located in the Southern Highlands of New South Wales and occupies a total area of 7.05 km². The major waterway branches within the catchment (i.e., Whites Creek, and the unnamed tributaries in the catchment referred to in the flood study as “Willow Creek” and “Railway Creek”) drains a 7 square kilometre catchment in a north westerly direction through Moss Vale before draining into the Medway Rivulet and into the Wingecarribee River. Flood simulation 2020 outcomes of the modelling determined that the most significant floodwater depths are predicted to occur within roadways, with Argyle Street and Lackey Road the most vulnerable roadways in the study area. In large floods, more roads would become inundated and would not be trafficable. In general, commercial properties adjoining Argyle Street are subject to a higher flood exposure during more frequent floods than residential properties. Overall, it is expected that 140 properties (101 residential and 39 commercial) would be subject to above floor flooding during the PMF event. The major overland flow path is along Railway Street to the south west of Whites Creek, which is the area proposed for Application SSD-9409987, which represents poor planning, hazard exposure with a high risk of disaster.

The planning proposes complete removal of the natural watercourse and the nonsensical plotting of the watercourse either side of the 8-acre building, which is a representation of a bio hazard storage facility built on floodplain, between a freshwater Creek and a River with the potential to pollute the Sydney Water Catchment for generations. Creek modification options including vegetation management and channel reshaping were considered in the Whites Creek Catchment Study of 2020, however, the conclusion was it would have negligible impacts during large floods. For Whites Creek Catchment, the latest simulation technology predicts (2020 study) flooding is expected to be more frequent as climate change intensifies weather, with flooding affecting all areas along Whites Creek. Application SSD-9409987 proposal would be to build the mega-tip plastic storage facility on riparian land, whose soils and vegetation is shaped by the presence of water, WaterNSW describes riparian zones as “unique and diverse and are often the most fertile parts of the landscape, but they are also vulnerable and can be easily degraded. Riparian zones can support cleaner water, reduce diseases and pests, and retain important nutrients and soil. The biohazard the flooding of a plastic mega tip poses is considerable risk for generations. Ironically, a floodplain’s purpose is to distribute rich alluvial soils, it should never be allowed to distribute toxic plastic waste and that’s another reason for my objection.

Another reason for my objection is my research into biomonitoring studies which have shown that human consumption of animals that were exposed to microplastics and additives persist in human population and can be harmful for human health, risks include coronary artery disease and obesity

among other diseases. Becoming obese by breathing the air, is another reason for my objection to a plastic nanoparticle polluting industry.

As an educator I'm aware that school excursions are in the top ten for student risk. I refer to GHD Application SSD-9409987 what I believe to be an ingenuine claim that the "proposal would also include facilities to enable educational activities for school groups and other interested parties to learn about plastic waste, plastic recycling and turning wastes into valuable resources." A similar scenario would be the Education Department approving an excursion to an asbestos factory. This may have been done in the past; however, recent scientific studies and Human Rights Watch conclude that exposing children to an environment with a concentration of microplastics is an unacceptable risk. I am concerned that GHD have included this anomaly in their EIS. Knowledge on the toxic hazard of microplastic nanoparticles which are able to pass the blood brain barrier by inhalation is scientifically proven. The risk matrix that school teachers and Principals must complete prior to any excursion would disqualify Application SSD-9409987 from allowing children dangerously close proximity to airborne toxins.

It's important to mention the beautiful habitat and its inhabitants in this riparian (which means situated by rivers) landscape, the ponds which provide safety for black swans and other water birds, and especially grand are the nine old growth Eucalyptus macarthurii trees, whose namesake had the reputation of a cultured gentleman botanist, horticulturist and agriculturist, James Macarthur (not to be confused with Governor John Macarthur). There are only two main occurrences of the species which predominantly lives in the Southern Highlands which are morphologically distinct (Klaphake 2010). In both locations, Wingecarribee Plateau and the Southern Tablelands, this species is found on flats and near swamps and streams, growing at moderately high altitudes and favouring cold, wet locations (Black 1982). The nine trees on the site are special to Moss Vale, endangered, and just like the water, need and deserve protection, conservation and a clean environment.