



Director
Development Assessment
Department of Planning and Environment
4 Parramatta Square,
12 Darcy Street,
Parramatta NSW 2150

To the Director,

Submission in response to the Environmental impact statement of the Moss Vale Plastics Recycling Project

I wish to express my strong opposition to the Moss Vale Plastics Recycling Facility SSD—9409987. I write as a representative of the Moss Vale community and as the NSW State Government Member for Goulburn. The Goulburn electorate encompasses the Moss Vale area.

While the concept of recycling and environmental sustainability is commendable, I believe that this specific project poses significant concerns and risks to our community and the environment in which it is proposed. In this submission, I will highlight several key reasons for my opposition. I've raised the point in Parliament, this is not a case of "not in my backyard" because it is not a backyard project; it is a serious industrial operation that has been proposed for a residential area.

My office has received hundreds of emails, phone calls and conducted many meetings in opposition to this proposal. I have been dismayed at the lack of genuine consultation within the community by the consulting company GHD, and what appears to be a lack of genuine desire to understand the impacts that this project imposes on the community. I am concerned by the complete disregard of community sentiment by the proponents' director, the sentiment which is – this is not the right site. It is important to ensure that the concerns of local residents are taken into account and that there is a transparent and inclusive decision-making process. The community should have a say in shaping projects that will significantly impact their lives and environment.

Of great alarm is that the proponent has stated that this site was selected mainly due to the fact the land was for sale and affordable. Furthermore, by the director's own admission, she has no experience in plastic recycling and nor does the Chief Technical Operator, Mr Lyu Yalin. The scale and purpose of the proposal is highly unsuitable for the site, situated next door to the sensitive Garvan Institute, adjacent to a school, on cattle farming land near residential homes.

As I understand, during an engagement session (held March 2022) the Director of Plasrefine, Nanxi Zheng, admitted that she and her uncle Mr Lyu have only visited recycling facilities in China, this is their only experience of the industry. This lack of experience does not give confidence to me, nor to the community that the proponents are capable of the successful construction and operation of such a contentious and potentially harmful facility with evidence suggesting further investigation into plastic processing facilities is required to determine the impacts to health and the environment.



I also note that the proposal requires an Environmental Protection Licence (EPL) to be obtained, and although this determination is a separate process, much consideration should be given to whether the applicant is considered to be fit to hold such a licence.

The proposed facility, to be constructed directly next to Garvan Institute of Medical Research, a world class rodent breeding facility that supplies mice to many of our vital medical research facilities in Australia. These animals are extremely sensitive to noise, vibration and odours – all of which will become an issue as soon as construction starts, not only once the facility is up and running. Garvan Institute employs many locals and provides a vital service to research institutes across Australia and around the world. Any adverse exposure to any of the factors on this facility could have long lasting impacts on the vital research these institutes are carrying out.

The operation of the facility details the predicted noise and vibration generation pollution, which can be disruptive to the lives of nearby residents. While within the EIS they have detailed how the project incorporates effective noise mitigation strategies to minimise disturbances. Ironically, they have provided a noise scale, which details the facility being designed to meet the night and day criteria of operating between 38 and 41 dB and ignores the fact that on the same scale, a truck is listed as “very loud” at 80dB which raises my next concern of the road and transport access to the facility.

If approved, this project will have up to 100 truck movements per day and 280 additional light vehicle movements. The proposal advises that a new access road be provided that extends from the plastics recycling and reprocessing facility site which is owned and occupied by the neighbouring Garvan Institute of Medical Research – who will not provide landowners consent for access until the project is supported by Council.

The proposed Moss Vale Plastics Recycling Facility is expected to process a substantial volume of plastic waste. The potential environmental consequences, including air and water pollution, greenhouse gas emissions, and impacts to the natural landscape, each needs to be thoroughly assessed and – I highlight - demonstrated. Everything that the proponent has written in the EIS is conceptual and without demonstrated experience.

The facility's proximity to residential areas raises concerns about the health and safety of local residents. The release of pollutants or hazardous materials, accidents, and the increased risk of fire associated with the operation of the recycling facility may pose health and safety risks to those nearby.

Furthermore, given that the project is situated in a region with sensitive water resources, it is crucial to evaluate the potential impact of the facility on groundwater quality and availability. Contamination of water sources could have far-reaching consequences for the environment and public health, making it necessary to assess and address this issue adequately.

I reiterate that this project is too risky for the proponents to have their “first go” in the industry in this location. Without robust, real, measures in place to mitigate these risks, the project could negatively impact the community, local ecosystems and air quality for generations to come.



Finally, the proposed facility may have an adverse impact on the aesthetic value of the area, affecting property values and the overall appeal of the Moss Vale region. It is crucial to evaluate how the real or perceived impacts of this project could affect locals' and residents' quality of life.

In conclusion, while I support the goal of increasing plastic recycling to reduce waste and promote environmental sustainability, I believe that the Moss Vale Plastics Recycling Facility project, as currently presented in this location, raises several critical issues that need thorough investigation and true resolution. Before approving this project, it is imperative that the proponent address the concerns raised by the community, conduct real, comprehensive environmental and health impact assessments, and ensure active community involvement in their decision-making process – particularly the location.

I am deeply concerned that any proponent can band together a potentially hazardous project on the cheapest land they can find, in the most inappropriate location. The negative impacts of the development, including traffic, visual, noise, odour, water and the social impacts on community far outweigh any other public benefit that such a development can offer and which can be better utilised on a site more suitable. I support the community in opposing this development and ask the proposal be refused for the reasons above.

I respectfully request that these objections be taken into consideration during the review of this project. I look forward to a thorough and transparent evaluation process that prioritises the best interests of the local community and the environment. Thank you for your attention.

Sincerely,



Wendy Tuckerman
Member for Goulburn