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Proposed Plasrefine Recycling and Reprocessing Facility at Moss Vale Amended Application (SSD-9409987)

This submission is made on behalf of WinZero Incorporated INC9887626 ('WinZero').

WinZero is an incorporated association formed following the Declaration of a Climate Emergency by the Wingecarribee Shire Council in February 2020. WinZero's purpose is to protect the natural environment, including by educating and involving the community, all levels of government and businesses in Wingecarribee Shire about living and operating in a way that will enable the net zero emissions target to be met before 2050, and researching the most effective ways to reduce carbon emissions and encouraging wide scale awareness and adoption.

Plasrefine Recycling Pty Ltd ACN 642 246 704 ('Plasrefine') is seeking approval for the construction and operation of a plastics recycling and reprocessing facility. The facility would have a processing capacity of up to 120,000 tonnes of plastic waste per annum (including 100,000 tonnes of mixed plastic and 20,000 tonnes of PVC and plastic films). It would also manufacture plastic fibers and resins with an output of up to 107,000 tonnes per annum of 'various plastic products, recovered metals or mixed plastic solids'.¹ The proposal also involves a laboratory to conduct recycling research and product development.²

WinZero is concerned about the impacts of such a facility on the natural environment of Wingecarribee Shire. WinZero has previously made a submission opposing the Application. WinZero continues to oppose the Amended Application by Plasrefine to construct and operate a plastics recycling and reprocessing facility at Moss Vale. The proposed location of this recycling and reprocessing facility at Moss Vale in the Southern Highlands is entirely inappropriate. The submissions made in respect of Plasrefine's Amended Application are in addition to issues previously raised by our association in opposition to the proposal

¹ GHD Pty Ltd, *Moss Vale Plastics Recycling and Reprocessing Facility Amendment Report* dated September 2023 p.iii.

² GHD Pty Ltd, *Moss Vale Plastics Recycling and Reprocessing Facility Amendment Report* dated September 2023 p.vi.

Summary of additional submissions

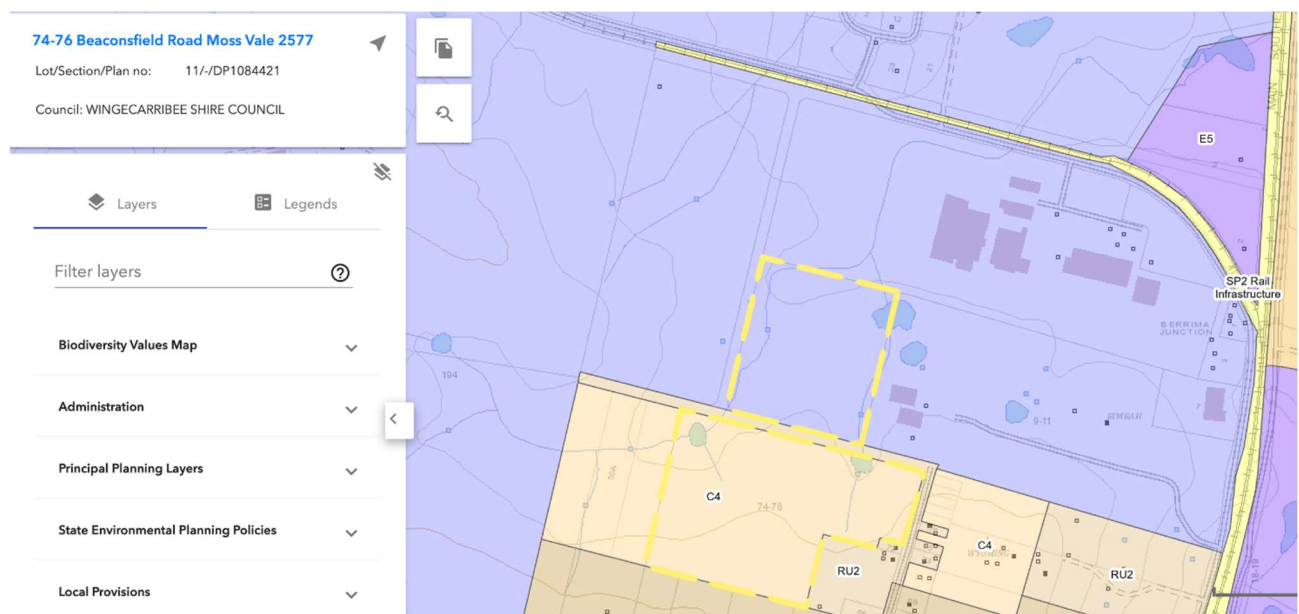
1. No buildings or ancillary infrastructure should be constructed on that part of Lot 11 that is north of Braddon Road.
2. No industrial development should be permitted on land zoned C4 Environment Living.
3. A facility that processes plastics of the types proposed requires separation from other development because of the nature of the processes involved, and the materials that will be used, stored or produced. The proposed Plasrefine recycling and reprocessing facility would be heavy industry not permitted on land zoned E4 General Industrial.
4. Boral Limited cannot give its consent to the use of the relevant part of Lot 3 DP1136734 for a use not permitted in the zone.
5. Any new secondary processing facilities needed for the pelletising and flaking of mixed plastics should be located on sites zoned for heavy industry close to the locations from which materials are sourced, for example in existing industrial locations in Sydney, Canberra and/or Wollongong.
6. Plasrefine should register on the Register of Industrial Chemical Introducers and be required to provide information in relation to the processes involved, or the materials used, stored or produced, in connection with the plastics recycling and reprocessing facility, as well as details of any technology (including patented inventions) to be used.
7. Plasrefine should be required to provide details of the proposed research laboratory on the Proposed Site and any related entities in international markets to which products will be sold.
8. The registered trade mark 2131827 PLASREFINE RECYCLING PTY LTD & Device held by Aunano Pty Ltd (ABN 57 630 147 616) is not capable of distinguishing the goods and services of Aunano Pty Ltd from other traders as it is the corporate name of Plasrefine Recycling Pty Ltd.
9. The proposed facility should not be permitted to destroy the western bank of the shared dam that straddles Lots 10 and 11 DP1084421 or harvest water from that dam for use in the proposed plastics recycling and processing facility.
10. The proposed development does not meet the terms of the positive covenant in Part 2.1 of the Section 88B Instrument that applies to DP1084421.
11. The development is not consistent with the aim of the Wingecarribee Local Environmental Plan to protect and enhance waterways, riparian land and water quality in the drinking water catchments of Wingecarribee. The development would have a negative (rather than neutral) effect on water quality in the Wingecarribee.
12. The proposed development has the potential to seriously and irreversibly negatively impact the natural environment of the Wingecarribee Shire.

Restriction on Use of Land. The proposed location at 74-76 Beaconsfield Road, Moss Vale is Lot 11 DP1084421 ('Proposed Site'). Deposited Plan 1084421 was registered on 5 July 2005. There is a restriction on use contained in the *Instrument setting out terms of easements and restrictions on the use of land intended to be created pursuant to section 88B of the Conveyancing Act, 1919* ('Section 88B Instrument'), namely that no dwelling is to be erected or permitted to remain on Lot 11 unless located within the area south of Braddon Road. The proposed plastics recycling and reprocessing facility and ancillary infrastructure would be located on the northern parcel of land in Lot 11 DP1084421.³

Additional submission 1

No buildings or ancillary infrastructure should be constructed on that part of Lot 11 that is north of Braddon Road.

Location. The Proposed Site consists of two parts, one being zoned E4 General Industrial (shaded light purple) and the other part being zoned C4 Environment Living (shaded yellow). That part of the Proposed Site zoned C4 Environmental Living is a low-density residential zone with special ecological, scientific and aesthetic values.



A plastics recycling and reprocessing facility should not be situated on land zoned C4 Environmental Living. There are a number of residences in close proximity to the proposed development that would be substantially impacted by the proposed development. For example, there would be a

³ GHD Pty Ltd, *Moss Vale Plastics Recycling and Reprocessing Facility Technical Report 9 – Greenhouse Gas* dated 27 January 2022 p.1.

significant noise output from plant and equipment operation which would be exacerbated by the movement of materials around the plant at all hours of the day and night, as well as many and large truck movements during daylight hours. The massive bulk and scale of the proposed development, exacerbated by the significant slope of the land to the northeast, together with lighting at the Proposed Site during nighttime hours, would result in adverse visual impacts 24/7.

Additional submission 2

No industrial development should be permitted on land zoned C4 Environment Living.

Heavy industry. The proposed Plasrefine facility has a processing capacity of up to 120,000 tonnes of plastic waste per annum, manufacture plastic fibers and resins with an output of up to 107,000 tonnes per annum of various plastic products, recovered metals or mixed plastic solids' and involves a laboratory to conduct recycling research and product development.

Part of the Proposed Site is zoned E4 General Industrial.

'*General industry*' is defined in the Wingecarribee LEP 2010 as 'a building or place (other than heavy industry or light industry) that is used to carry out an industrial activity'.

'*Heavy industry* means a building or place used to carry out an industrial activity that requires separation from other development because of the nature of the processes involved, or the materials used, stored or produced, and includes - (a) hazardous industry, or (b) offensive industry. It may also involve the use of a hazardous storage establishment or offensive storage establishment.'

The facility would have the potential to reprocess the following plastic types:

- Polyethylene terephthalate (PET) bottles
- High-density polyethylene (HDPE) bottles
- Polypropylene (PP) bottles
- Acrylonitrile butadiene styrene (ABS)
- Low-density polyethylene (LDPE) recycled films
- Unplasticized polyvinyl chloride (UPVC) recycled pipes⁴

The raw incoming material would be unloaded and transferred to one of the two automatic sorting lines. Unwanted materials such as glass pieces, metal wire, aluminium, copper, caps and other recyclables would then be removed by screening, optical sorters and magnetic separators. Oversized materials would be

⁴ GHD Pty Ltd, *Moss Vale Plastics Recycling and Reprocessing Facility Technical Report 9 – Greenhouse Gas* dated 27 January 2022 p.7.

picked out manually via manual sorting platforms. The recyclable materials not suitable for further processing on site would be sent offsite to recycling facilities. The remaining non-recyclable materials would be disposed to EPA licensed facilities. The PET, PP and PE bottles would be sorted by plastic type and colour using optical, smart arm methods and cleaned using steam comprising a heated alkaline water solution at 193 degrees Celsius. The condensed steam would be recirculated following treatment at the wastewater treatment plant. The PET, PE, and PP bottles and PE film would be crushed and mixed in batches and sterilised and deodorised using the patented disinfectant solution. The sorted material would be pelletised or shredded into flakes suitable for sale at this point or transferred to building 2 for further processing. Waste plastic sorting and cleaning as well as crushing and cleaning lines will be housed in Building 1 while granulation and extraction will occur within Building 2. The processed material would be used to produce more advanced plastic products such as PET sheets, PET packing belts, wood plastic composites, plastic logistic pallets, furniture or turnover boxes. The plastic flakes, pellets or plastic derived products would be sold to domestic or international markets. Filter residue from extrusion and granulation would be transferred off site and disposed at an EPA licensed facility. Material testing associated with manufacturing and processing would also be undertaken at the laboratories located in building 2.⁵

Additional submission 3

A facility that processes plastics of the types proposed requires separation from other development because of the nature of the processes involved, and the materials that will be used, stored or produced. The proposed Plasrefine recycling and reprocessing facility would be heavy industry not permitted on land zoned E4 General Industrial.

Boral Limited. The Amendment Report contains a change to the preferred access road which is now the north-south road option. Plasrefine is now proposing relocation of the existing level crossing at Douglas Road / Collins Road and a new level crossing 190 metres west of the current location.

In a letter dated 11 September 2023 from Boral Limited to the Director, Industry Assessments Department of Planning & Environment, Boral Limited notes that Plasrefine proposes to realign a rail crossover over land owned by Boral Limited, the owner of Lot 3 DP1136734. The railway line is zoned SP2 Rail Infrastructure. There is land at 2 Lackey Road Moss Vale zoned E5 Heavy Infrastructure (shaded dark purple on the map above), however the land adjoining Lot 11 DP1084421 is zoned E4 General Industrial.

Additional submission 4

Boral Limited cannot give its consent to the use of the relevant part of Lot 3 DP1136734 for a use not permitted in the zone.

⁵ GHD Pty Ltd, Moss Vale Plastics Recycling and Reprocessing Facility Technical Report 9 – Greenhouse Gas dated 27 January 2022 p.7.

Proximity to feed sources. The proposal will have significant adverse traffic impacts for Southern Highlands residents. In our previous submission, we commented on feed sources and quality, including the need to have greater information as to transport routes to and from the plant and volumes for each route, the types of plastic material that would be processed, the density of the feed material (dictating the size of the trucks required to meet the design processing volumes) and the likely deleterious emissions from the process which would be dependent on feed analyses and the availability of suitable feed material for the plant when competing with alternative processing facilities. The EIS made a number of assumptions about likely delivery routes and vehicle types, however the feed materials would be processed off-site by third parties and would use transport providers independent of Plasrefine.

The *NSW Waste and Sustainable Materials Strategy 2041* dated June 2021 states that we need to reduce carbon emissions through better waste and materials management. This document is referred to in the 'Justification and need' section of the Amendment Report,⁶ however closer examination of this strategy shows that only some new secondary processing facilities are needed for pelletising and flaking of mixed plastics to service NSW in 2030.⁷ The proposed facility would have a 25+ year life, taking it to at least twenty years past that date. Reductions in the use of plastic over time should reduce the need for secondary processing facilities. The Southern Highlands is an environmentally-conscious region looking to implement long-term strategies as a matter of urgency to achieve nature-positive outcomes.

Additional submission 5

Any new secondary processing facilities needed for the pelletising and flaking of mixed plastics should be located on sites zoned for heavy industry close to the locations from which materials are sourced, for example in existing industrial locations in Sydney, Canberra and/or Wollongong.

Patents. Plasrefine Recycling Pty Ltd and its related bodies corporate, namely Green Cycle Holding Pty Ltd (ABN 66 642 244 639) and Mr Lyu Pty Ltd (ACN 642 242 233), do not appear to have expertise or prior trading experience in the waste or recycling industries. Plasrefine is not registered on the Australian Register of Industrial Chemical Introducers.

The Greenhouse Gas Report states, 'The PET, PE, and PP bottles and PE film would be crushed and mixed in batches and sterilised and deodorised using the patented disinfectant solution' but the relevant patent is not specified.

⁶ GHD Pty Ltd, *Moss Vale Plastics Recycling and Reprocessing Facility Amendment Report* dated September 2023 p.vi.

⁷ See p.20.

Additional submission 6

Plasrefine should register on the Register of Industrial Chemical Introducers and be required to provide information in relation to the processes involved, or the materials used, stored or produced, in connection with the plastics recycling and reprocessing facility, as well as details of any technology (including patented inventions) to be used.

The family of the director of Plasrefine appears to have run a waste-water treatment business in China, for example Mr Lyu Yalin, a shareholder in Aunano Pty Ltd, has involvement with chemical waste treatment in Beijing.⁸ Lyu Yalin appears to be the inventor in respect of two Australian patents granted to Beijing Hongna Luyan Technology Development Co. Ltd ⁹:

AusPat Summary Report						
Application Number	2019100134	Serial Number		PCT Number		WIPO Number
Filing Date	2019-02-07	Earliest Priority Date	2018-09-21	First IPC Mark	A61L9/013	Application Status GRANTED
Title	A PLANT-DERIVED GERMICIDAL DEODORANT FOR ENVIRONMENTAL TREATMENT AND ITS PREPARATION METHOD					
Applicant(s)	Beijing Hongna Luyan Technology Development Co., Ltd					
Inventor(s)	GUO, Zhanhui; LYU, Yalin					
Agent Name	Baxter Patent Attorneys Pty Ltd					
Application Number	2019100132	Serial Number		PCT Number		WIPO Number
Filing Date	2019-02-07	Earliest Priority Date	2018-09-21	First IPC Mark	A61Q15/00	Application Status GRANTED
Title	PLANT SOURCED EXTRACTION OF REMOVING FORMALDEHYDE DEODORANT AND ITS PREPARATION METHOD					
Applicant(s)	Beijing Hongna Luyan Technology Development Co., Ltd					
Inventor(s)	GUO, Zhanhui; LYU, Yalin					
Agent Name	Baxter Patent Attorneys Pty Ltd					

The applicant in respect of these patents, Beijing Hongna Luyan Technology Development Co. Ltd is the grantor in respect of various patents in China that are used in heavy industry / hazardous processes. The proposal states that the facility will include a laboratory to conduct recycling research and product development. Plasrefine is not an accredited organization on the website of NATA (National Association of Testing Authorities, Australia). No information has been provided as to whether it is proposed that the laboratory at the Proposed Site will be controlled or associated with research and product development being conducted by Beijing Hongna Luyan Technology Development Co. Ltd in China. It is unclear whether Plasrefine will be importing technology or expertise from China and what accreditation Plasrefine or its related entities have or may obtain relation to the conduct of research and development in plastics recycling.

The Greenhouse Gas Report states, 'The plastic flakes, pellets or plastic derived products would be sold to domestic or international markets.' It is not clear

⁸ Southern Highlands Express, *Plastic Factory Unwrapped*, 19 May 2021.

⁹ AusPat search of 28 October 2023.

whether the proposed international markets include markets in which Plasrefine and its related entities are already operating, such as China.

Additional submission 7

Plasrefine should be required to provide details of the proposed research laboratory on the Proposed Site and any related entities in international markets to which products will be sold.

Trade marks. The trade mark 2131827 PLASREFINE RECYCLING PTY LTD & Device has been registered in Australia by Aunano Pty Ltd (ABN 57 630 147 616) in respect of the following goods and services:

Class 1: Plastics in the form of chips; Plastics in the form of flakes; Plastic products in the form of pellets; Plastics in the form of granules; Plastics in the form of raw materials; Polyesters; Co-polyester resins; Polyester resins (semi-finished); Polyester resins (unprocessed); Unsaturated polyester; Unsaturated polyester resins; Resins (chemical)

Class 39: Collection (transport) of waste and trash; Transportation of waste; Storage of waste; collection, transportation, and storage of plastic waste

Class 40: Destruction of waste and trash; Processing of waste materials; Recycling of waste; Treatment (recycling) of waste; Treatment (transformation) of waste; Treatment of waste; Waste recycling services; Recycling; Recycling of plastics; sorting of plastics; destruction, processing, recycling, and treatment of plastic waste

This trade mark is arguably not capable of distinguishing the goods and services of Aunano Pty Ltd from other traders as it contains the corporate name of Plasrefine Recycling Pty Ltd, see *Trade Marks Act 1995* s.41 and *Trade Marks Manual of Practice and Procedure* s.22.19. The relationship between Aunano Pty Ltd (shareholders Zheng, Nanxi and Lu, Yalin of 302-1-5 Jianhuabeili, Liangxiang,, Fangshan Beijing, China) and Plasrefine Recycling Pty Ltd and any transfer pricing arrangements connected with the trade mark should be clarified.

Additional submission 8

The registered trade mark 2131827 PLASREFINE RECYCLING PTY LTD & Device held by Aunano Pty Ltd (ABN 57 630 147 616) is not capable of distinguishing the goods and services of Aunano Pty Ltd from other traders as it is the corporate name of Plasrefine Recycling Pty Ltd.

Protection of waterways, riparian land and water quality. The Proposed Site is on riparian land listed on the Natural Resources Sensitivity Map. It is in close proximity to Cecil Hoskins Nature Reserve, a protected wetland almost half of which is comprised of a lagoon formed by the backed-up waters of the Bong Bong Weir.¹⁰ Over 90 bird species inhabit the

¹⁰ See Cecil Hoskins Nature Reserve Plan of Management available at: <https://www.environment.nsw.gov.au/research-and-publications/publications-search/cecil-hoskins-nature-reserve-plan-of-management>

reserve and around one third of these, including pacific black ducks, black swans, dusky moorhens and grey teals, are waterbirds that are dependent on the lagoon. Platypus and kangaroos also make their homes in and around the lagoon. The reserve also supports stands of Eucalyptus Macarthurii, native to the Moss Vale district, as well as snow gum banksia and a range of other native species. The lagoon itself is deep enough for large aquatic plants to thrive, such as tall spikerush, ribbonweed, yellow bladderwort and water milfoil. Other aquatic species include water snowflake, starwort, water primrose, river buttercup and nardoo.¹¹

Input water. Council indicated that it may not be able to meet the expected demand for water to supply the proposed facility.¹² It is not proposed that the facility would source a significant quantity of water from town water mains (about 18 kilolitres per day) sourced from a combination of rainwater harvesting and the town water mains.

'In its response to the Response to the Submissions report, the Department of Planning and Environment: Water sought further details on how the proposed water storage dams meet the requirements of the water regulatory framework. During preparation of this report, GHD consulted with Water NSW regarding these requirements and sought to understand the requirements of a Harvestable Rights Order and how it relates to the shared dam that straddles Lot 10 and 11 of DP 1084421.'¹³

We are concerned that the proposed facility plans to harvest water from the shared dam that straddles Lots 10 and 11 DP1084421. The Water Management Act 2000 (NSW) Chapter 3 Part 1 Division 2 deals with harvestable rights. The *Harvestable Rights (coastal-draining catchments) Order 2022* refers in paragraph 4(b)(ix) to the *Water Sharing Plan for the Greater Metropolitan Region Unregulated River Water Sources 2011* relevant to Lot 11 DP1084421. This shared dam is located less than 3 km from Cecil Hoskins Nature Reserve, an important wetland, and is heavily used by local fauna. Moreover, the proposed reconstruction of the western bank of the shared dam would have a significant adverse impact on local fauna.

Additional submission 9

The proposed facility should not be permitted to destroy the western bank of the shared dam that straddles Lots 10 and 11 DP1084421 or harvest water from that dam for use in the proposed plastics recycling and processing facility.

¹¹ NSW National Parks and Wildlife available at: <https://www.nationalparks.nsw.gov.au/visit-a-park/parks/cecil-hoskins-nature-reserve/learn-more>.

¹² GHD Pty Ltd, *Moss Vale Plastics Recycling and Reprocessing Facility Amendment Report* dated September 2023 p.18.

¹³ GHD Pty Ltd, *Moss Vale Plastics Recycling and Reprocessing Facility Amendment Report* dated September 2023 p.28.

Section 88B Instrument. The Proposed Site is Lot 11 of DP1084421, which was registered on 5 July 2005. The Section 88B Instrument burdens the Proposed Site with the following covenants in relation to wastewater management:

The wastewater management system is to be designed in accordance with the principles contained within the guideline "On site Sewage Management for Single Households" and AS/NZS 1547-2000 "On site domestic Wastewater Management"

The wastewater management system is to be maintained according to Section 5 of the guideline "On site Sewage Management for Single Households" and AS/NZS 1547-2000 "On site Domestic Wastewater Management"

All effluent is to be assimilated within the boundaries of the lot

No effluent management areas are to be located within 100 metres of any creek or watercourse, whether perennial or intermittent or within 40 metres of a drainage depression.

AAA rated water conservation devices are to be installed in the dwelling to minimise the volume of wastewater produced

Effective erosion and sediment controls are to be installed prior to any construction activity to prevent erosion and subsequent pollution of waters by siltation. The controls are to be maintained until completion.

All stormwater collected from roofs and other hard surface areas is to be diverted away from any effluent management areas. eg by means of a stabilised bund or drain with provision for energy dissipation at the outlet to prevent scouring or erosion.

Additional submission 10

The proposed development does not meet the terms of the positive covenant in Part 2.1 of the Section 88B Instrument that applies to DP1084421.

Stormwater management. The Notice of Determination of development application 19/1525 dated 9 July 2019 stated that Lot 11 DP1084421 is flood prone in part, traversed by watercourses, not connected to stormwater infrastructure and degraded; Council was not satisfied that the development could effectively manage stormwater and achieve a neutral or beneficial effect on water quality.

The Amendment Report contains a revision to the stormwater management strategy, however the facility would still produce up to 10 kilolitres per day of process wastewater for disposal to sewer (in addition to about 10,000 tonnes per annum of residual waste for disposal to landfill). Further, there would be about 9,000 tonnes per year of dewatered sludge (filter cake residue) from the wastewater treatment plant for further processing into products, or otherwise disposal to landfill and about 1,800 tonnes per year of filter residue and waste filters from the extrusion and granulation process for disposal to landfill.¹⁴

¹⁴ GHD Pty Ltd, Moss Vale Plastics Recycling and Reprocessing Facility Amendment Report

One of the aims of the Wingecarribee Local Environmental Plan 2010 is to protect and enhance waterways, riparian land and water quality in the drinking water catchments of Wingecarribee.¹⁵ Further, the *State Environmental Planning Policy Amendment (Water Catchments) 2022* (NSW) requires development in the Sydney Drinking Water Catchment to have a neutral or beneficial effect on water quality.

Additional submission 11

The development is not consistent with the aim of the Wingecarribee Local Environmental Plan to protect and enhance waterways, riparian land and water quality in the drinking water catchments of Wingecarribee. The development would have a negative (rather than neutral) effect on water quality in the Wingecarribee.

Biodiversity. The Proposed Site has threatened species or communities with potential for serious and irreversible impacts as listed on the Biodiversity Values Map. In addition to the removal of 0.28 ha of farm dams and associated vegetation that have been assigned in PCT 1256 - Tableland swamp meadow on impeded drainage sites of the western Sydney Basin Bioregion and South Eastern Highlands Bioregion, the proposed facility would have the following adverse impacts on the natural environment:

- Removal of 0.04 ha of planted trees that have been assigned to PCT 944 Mountain Grey Gum – Narrowleaved peppermint grassy woodland on shales of the Southern Highlands, southern Sydney Basin Bioregion
- Removal of 0.28 ha of potential habitat for the Southern Myotis
- Removal of nine planted specimens of *Eucalyptus macarthurii*, listed as endangered under the *Biodiversity Conservation Act 2016* (NSW) and the *Environment Protection and Biodiversity Conservation Act 1999* (Cth)
- Potential indirect impacts to adjoining vegetation associated with edge effects, light spill, noise and introduction of weeds and pathogens.

Additional submission 12

The proposed development has the potential to seriously and irreversibly negatively impact the natural environment of the Wingecarribee Shire.

dated September 2023 p.iv.

¹⁵ Wingecarribee Local Environmental Plan 2010 clause 1.2(p).

Conclusion. The Greenhouse Gas Report prepared in respect of the proposed facility states that:

- Scope 1 and 2 emissions from construction of the proposal are estimated as approximately 2,600 tCO₂-e, over the construction period; and
- Annual Scope 1 and 2 emissions during operations are estimated as approximately 91,033 tCO₂-e, which is approximately 0.07% of NSW's annual emissions and 0.02% of Australia's annual emissions.¹⁶

The estimated energy consumption of the proposed facility is 8,500 kWh.¹⁷ The Greenhouse Gas Report recommends as a mitigation measure that consideration be given to installing solar panels on the roof areas,¹⁸ but no estimates for how much power would be sourced from solar have yet been made.¹⁹

The *NSW Waste and Sustainable Materials Strategy 2041* states that we need to reduce carbon emissions through better waste and materials management. A greenfields site in the Southern Highlands, zoned in part C4 Environment Living, is not an appropriate location for a new secondary processing facility for the pelletising and flaking of mixed plastics. For the reasons set out in both our submissions, the proposal would have significant adverse impacts on greenhouse gas emissions and the natural environment.

WinZero requests that the Department refuse the application by Plasrefine for a plastics recycling and reprocessing facility at 74-76 Beaconsfield Road in Moss Vale.



Derek White
WinZero Secretary

¹⁶ GHD Pty Ltd, *Moss Vale Plastics Recycling and Reprocessing Facility Technical Report 9 – Greenhouse Gas* dated 27 January 2022 p.i.

¹⁷ GHD Pty Ltd, *Moss Vale Plastics Recycling and Reprocessing Facility Amendment Report* dated September 2023 p.iv.

¹⁸ GHD Pty Ltd, *Moss Vale Plastics Recycling and Reprocessing Facility Technical Report 9 – Greenhouse Gas* dated 27 January 2022 p.ii.

¹⁹ GHD Pty Ltd, *Moss Vale Plastics Recycling and Reprocessing Facility Technical Report 9 – Greenhouse Gas* dated 27 January 2022 p.12.