

Objection to the proposed Moss Vale Plastic Recycling Plant

Woodlands 2575

March 21st, 2022

I am writing to object to the EIS that has been put forward for the construction and operation of the Moss Vale Plastic Recycling Plant. My objection is not to the concept of the plant itself, such facilities are readily justified on environment grounds, nor the locating of the plant within the Moss Vale Innovation Precinct (SHIP).

However, the EIS provides ample evidence that the site chosen is unsuitable for the purpose intended. The plant should be located towards the western end of the SHIP, away from residential properties, where similar medium to heavy industry exists or is planned. My reasoning follows:

Problems with the chosen site

The site is flood prone in parts and is very close to residential property. Heavy vehicles will require access during construction and operation, and while the EIS states that this will be via a newly constructed industrial road (off Lackey Rd), the company proposes that that it be granted heavy vehicle access via residential streets until a substantial amount of land is acquired from a neighbouring facility to complete this road.

The EIS estimates that that access through the residential area (Lytton Rd and Beaconsfield Rd) will only be required for a month, but the company reserves its rights to continue through these roads if land acquisition negotiations become protracted. This approach is effectively holding the residents hostage to the bargaining strategies of the companies involved. Land acquisition negotiations can take years and may involve legal proceedings

BEACONSFIELD RD SHOULD REMAIN CLOSED OFF TO TRAFFIC FROM THIS PLANT AND NO CONSTRUCTION SHOULD COMMENCE UNTIL THE ACCESS ROAD IS COMPLETED.

Alternative Access via Douglas Rd

The EIS rules out entry to the proposed site from Douglas Rd due to the sharpness of the turn required across the rail siding servicing other industry. It points to the preference of transport authorities to minimize potential contact between heavy vehicles and train traffic.

Some land may be required to facilitate the turn of heavy vehicles across the rail siding but that would be a fraction of that required with the access off Lackey Rd. The conflict with rail traffic may be a consideration but exactly the same level of conflict exists for their chosen Lackey Rd route.

If the plans for the development of the road network in the SHIP go ahead as planned, conflict with the rail siding will be eliminated and a direct turn into the plant site from the northern side will be possible and preferable.

EIS Issues

The EIS was prepared by long established engineering consultancy GHD, and as such it is surprising that simple errors in fact appear through the document. I have already mentioned the faulty comparison of rail crossing impacts between the Lackey Rd and Douglas Rd Access alternatives.

The EIS also mentions the impact of the plans of Hume Coal to use the rail siding to transport coal to Port Kembla. Surely GHD would be aware that the Hume Coal Project was refused by the Independent Planning Commission on August 31st last year and has been wound up.

The EIS also talks about surface water flowing from the site, under Collins Rd to the Wingecarribee River and then to the Wingecarribee Reservoir. This water goes nowhere near the Reservoir, but instead flows into the Warragamba catchment.

Simple errors such as these raise questions as to the thoroughness that the EIS document has been prepared, and there certainly has been considerable glossing over of potential problems with the operations of the plant.

Air Quality, Noise and Risk of Fire

The EIS states that potential environmental issues, particularly noise and air quality will be managed by operational means; 'fast acting' roller doors to keep unloading noise within an enclosed building and scrubbing equipment to clean-up gaseous emissions. While this may be satisfactory in an isolated location, the proximity to residential property of the proposed plant and the risk of equipment malfunction makes these solutions unsatisfactory here.

The quality of the feedstock to the plant is uncertain, with high levels of contamination possible. The solvent used for cleaning is not declared as it is 'proprietary'. Untreated emissions can contain benzene and toluene and possibly other highly dangerous hydrocarbons. When things go wrong, as they inevitably will, the risks to nearby residents are serious.

While we can be reasonably sure that the level of fire protection in the buildings will meet the standards required, fires have occurred at facilities of this kind in the past, one major event in Melbourne coming to mind. This fire caused major air quality problems over a large area and burned for days. In positioning a plant of this kind near a residential area, we are placing a lot of faith in the ability of the operators to maintain a tightly controlled operation.

THERE HAS BEEN NO INTERACTION WITH THE PEOPLE WHO WILL ACTUALLY BE OPERATING THE PLANT, AND THE COMPANY HAS NO TRACK RECORD FOR THIS KIND OF OPERATION IN AUSTRALIA.

The community has had no opportunity to assess the abilities of the individuals that will be associated with the planned facility. In my view the risks are too great to allow the plant to be built on the proposed site.

Summary

While there is a clear need for facilities for plastic recycling generally and Moss Vale is well located in terms of transport logistics for the proposed activities, the site chosen and the plans that have been put forward for the construction and operation of the recycling facility are not acceptable, for the reasons outlined above.

Other parcels of land exist within the SHIP that are remote from residential areas, provide easier heavy vehicle access and lower environmental risks. This EIS should not be considered acceptable in its present form.

As a final comment, while my wife and I are not directly affected by this proposal, I am concerned that if this project is approved in its present form, it will set a precedent for similar poor-quality applications in the future. We have the great fortune to live in a wonderful part of Australia, and while development is inevitable, and jobs need to be provided, high standards must be maintained.

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