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October 28 2012

**RE: SUBMISSION IN RESPONSE TO PROPOSAL SDD-498 INCITEC PIVOT AMMONIUM NITRATE MANUFACTURING FACILITY, KOORAGANG ISLAND**

**I am writing to express my deep concern about this proposal as it represents a dangerously inappropriate land use in such close proximity to schools and residential areas. Furthermore, I support a comprehensive and adequate review of the cumulative impacts of industry on the health and safety of the community of Mayfield and surrounding areas.**

Below is a summary of my concerns informed by a review of the Development Application, Environmental Impact Assessment and Community Survey related to this Development Application.

**1. Hazardous substances – health and environmental effects**

Anhydrous ammonia, nitric acid and ammonium nitrate are all hazardous substances causing variously burning of the eyes, nose and throat, coughing and choking. Storage and/or use of these substances in such quantities in close proximity to schools and residential areas is a completely inappropriate land use.

This represents a serious risk to the health and safety of the local environment and the community. Of particular concern is the impact on the ground and surface water within the vicinity of Kooragang, air quality, and the risks to human health posed by the potential for leakage and explosion.

The proponents have failed to adequately address management and mitigation of these impacts on the community in their proposal in the event of a serious or catastrophic event at the site.

**2. Truck movements and traffic – noise, vibration, air quality and risk of health and environmental affects**

The increase in shipping and truck movements during both construction and operation phases within the local area and across the Hunter Region will contribute to already risky levels of traffic in terms of noise, dust, vibration, and traffic accidents. That the EIS states there will be “no significant changes to the level of service on the local roads” is doubtful given the nature and scope of the proposal. The proponents themselves recognise that traffic will increase significantly and have therefore sought to mitigate this for example with a park-and-ride facility during the construction phase. This seems an inadequate measure given that commuters will still need to drive to and park within proximity of the facility thus affecting surrounding roads.

The air quality experienced by residents in the Mayfield area is already of serious concern, with high rates of respiratory irritation and infection. Given the proximity of Industrial Drive to the Mayfield

East Public School, any proposal which represents such significant increases in traffic should be viewed with caution.

In addition, the risk of explosion and leakage represented by this proposal is of serious concern to residents in the Mayfield area particularly given the proximity of this site to the Orica facility.

### **3. Cumulative effects assessment**

The proponent states that “where possible” they have addressed cumulative effects in terms of the local health and community impacts. This assessment is seriously limited for a number of reasons:

Firstly, Incitec Pivot claims in its EIS that in many areas “no significant residual impact as a result of the Project” (p46) and therefore in most instances a cumulative effects assessment (CEA) was not required. I question the findings of “no residual impacts” and therefore the statement that an assessment of cumulative impact is not required.

Secondly, the failure to account for current operations in the Kooragnag area in the assessment of cumulative effects is flawed, as this baseline assumes that there is an adequate current assessment of impacts from these operations.

Thirdly, it is concerning that there has been no cumulative assessment of the impact on greenhouse emissions as a result of this proposal (p89).

### **4. Social and health impacts**

I seriously question the methodology and effectiveness of the Community Survey conducted by Coakes Consulting.

Firstly, this is not a Social Impact Assessment or a Health Impact Assessment, but rather a perceptions and attitudes survey. **As such, no comprehensive social and health impact assessment has been produced. This is alarming given the nature and extent of the proposal by Incitec Pivot and its proximity to schools and residential areas.** I support the conducting of a comprehensive and effective Social and Health Impact Assessment as a matter of priority before the determination of this DA.

Secondly, a single random telephone survey is markedly divergent from current best practice in Social and Health Impact Assessment which calls for the meaningful engagement of a range of communities and stakeholders, and the use of multiple and comprehensive methodologies.

### **5. Stakeholder engagement**

It is alarming that no local schools have been identified as part of the Stakeholder Engagement Strategy conducted by Incitec Pivot. This points to a disregard for the health and well-being of our children and young people, who are the community leaders of our future.

It is also concerning that Incitec Pivot have failed to identify or engage with grassroots and environmental organisations including the Newcastle Wilderness Society, The Greens, Climate Action Newcastle and the Mayfield East Residents’ Group.

Of particular concern is the methodology and rationale for the Stakeholder Engagement strategy. This is better described as a Public Relations approach where the proponent seeks ways of communicating their message with stakeholders, rather than meaningfully engaging with and responding to the concerns of stakeholders.

## **6. Climate change, jobs and the local economy**

The direct and indirect impacts of this proposal through its contribution to the coal mining industry in the Upper Hunter Valley is of concern to us. I support the transition to a low carbon and sustainable economy and believe that the Hunter Region could be leading Australia in this endeavour. At present, our Region risks being left behind in terms of scoping and investing in alternative industries such as solar thermal and wind technologies. As we continue to experience negative health and social impacts, we also risk being left without the effective social and economic means to remediate the damaging and polluting impacts that have resulted from mining and related industries within this Region.

Furthermore, I question the positive economic impact and job generation claimed by the proponents. The most vulnerable in our community, including Aboriginal people and the long term unemployed, continue to be marginalised from regional economic development. Alternative research has also identified the significant costs borne across this region as a result of the health and well-being impacts of mining and related industries thus offsetting any positive financial impacts associated with developments of this kind.

Thank you for your consideration of this submission and I trust you will act in the long term interests of the local community and Regional economy in determining this Application.

Sincerley,

A handwritten signature in blue ink, appearing to read 'Alison Harwood'.

Alison Harwood