

Mayfield East Public School P&C Association
Cnr Crebert/Ingall St
Mayfield NSW 2304

25th October 2012

Mining and Industry Projects
Department of Planning and Infrastructure
By email: plan_comment@planning.nsw.gov.au

To Whom It May Concern,

We are writing to object to INCITEC's proposed construction of an ammonium nitrate manufacturing facility with a production capacity of up to 350,000 tonnes per annum at 39 Heron Road, Kooragang Island (Application Number SSD-4986).

The members of Mayfield East Public School P&C Association represent the families of our 250 school children and we are very concerned about the dangers and potential health impacts for children at the school.

We are concerned both about the extent to which the new facility will contribute to the alarming growth in air pollutants in the densely populated Mayfield area, and about the possibility of a catastrophic explosion.

We note that the Newcastle Herald reported on 8 October 2012 that, according to the government's National Pollutant Inventory, Mayfield has experienced a surge in some pollutants over the last decade. The article said in part:

Inventory statistics indicate that the number of pollution-generating industries in the area increased from nine to 16 between 2001 and 2011. The number of officially reported pollutants from those sites increased from 35 to 38.

Ammonia emissions grew 188 per cent, benzene 600 per cent, sulphur dioxide 312 per cent and carbon monoxide 6 per cent, with most of this increase attributed to industries on Kooragang Island.

After last year's highly publicised malfunctions of the Orica fertiliser plant on Kooragang Island, the State Government introduced tough new pollution control measures and there is evidence that these will soon result in lower emissions of some pollutants.

That's is good news, but residents of the affected suburbs are rightly calling for a smarter approach to applications by companies to build new industrial plants in the area. Instead of considering each application in isolation, it is argued, approval authorities should examine every proposal against a backdrop of the existing environment.

We support this proposal to consider all development applications at Kooragang Island against the backdrop of the polluting industries already there, and urge you to refuse this development application on these grounds.

We also note that the Newcastle Herald reported on Thursday 20 September (p9) that INCITEC is refusing to release details of the explosion blast "overpressure" maps that would show the extent of devastation if there was a catastrophic blast in the proposed facility. This lack of transparency suggests a disturbing attempt to conceal, from the community who should be most entitled to it, information of the utmost importance.

The same article drew attention to the 2001 explosion in an ammonium nitrate manufacturing facility in Toulouse, France. It quoted Stockton Community Action Group spokesperson Keith Craig saying that the explosion in Toulouse destroyed thousands of buildings and killed hundreds of people. Mr Craig went on to point out that the plant in Toulouse only stored 300 tonnes of ammonium nitrate, whereas between them INCITEC and Orica have requested permission to store 20,000 tonnes.

Given the close proximity of Mayfield East Public School (MEPS) to the proposed facility we are very concerned that MEPS and its students may be in significant danger in the event of such an explosion.

We note that INCITEC employed a third party to conduct its risk and hazard reports, which state that the risk of a fatality from an incident at the factory is low.

Despite this, it seems certain, from the figures mentioned above, that the scale of a worst-case explosion would be so devastating as to be almost unimaginable in its consequences, an order of magnitude greater than any disaster Australia has ever witnessed.

We believe the proposed facility should not be constructed so close to residential areas, nor so close to the existing Orica explosives facility. We urge you to refuse the development application.

We have not made any reportable political donations (more than \$1,000) in the last two years.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'S Clarke', with a stylized, cursive script.

Stephen Clarke

President
Mayfield East P&C Association

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