

Submission to the NSW Department of Planning and Industry in regard project application

SSD - 4986 Ammonium Nitrate Plant, Incitec Pivot Limited, Kooragang Island

Submission lodged by: Ms Amanda McLaughlan

Address: 9 Douglas Street

STOCKTON 2295 NSW

Note: I am not a member of any political party and have made no political donations in the last 2 years

I, Amanda McLaughlan, 9 Douglas Street, Stockton, NSW object to the proposal by Incitec Pivot Limited to develop large volume ammonium nitrate production and storage facilities on Kooragang Island.

I have read the Environmental Impact Statement (EIS) and am concerned about a number of safety shortcomings in this statement.

Of greatest concern is the paucity of consideration, and hence risk mitigation strategies, applied to the possible interactions of other industrial processes on Kooragang Island. Potentially unstable chemicals in close vicinity to the nation's largest coal storage stacks and another ammonium nitrate plant pose a threat to urban populations that is unacceptable.

I am fully cognisant that ammonium nitrate is in itself not an explosive. However, heat, moisture and movement can cause instability that leads to explosions. Such events are well documented and have led to considerable loss of life and property damage at sites across the world. The proposed facility is close to population centres of Stockton, Mayfield, Tighes Hill and Newcastle City. The risk posed by this facility and the risk of a 'perfect storm' interaction with the other ammonium nitrate plant, coal stacks, fertilizer storage and canola oil storage cannot and should not be underestimated.

Newcastle experienced one of the most severe earthquakes recorded in Australia's seismological recorded history in 1989 and the geological location of a number of fault lines in the local area would indicate that this was not an isolated event. Indeed, the local Aboriginal people, the Awabakal, have a strong oral history of regular 'earth-shaking' events in the Newcastle area. Such movement would certainly have the capacity to destabilise the ammonium nitrate causing and explosive self sustained decomposition.

It is of great concern that individual EISs for developments on Kooragang Island do not and, seemingly, are not required to explore in detail possible interactions and cumulative consequences of other existing and proposed developments. A detailed development plan is required for the island.

Road transport to, from and across the island is limited to a two lane bridge to the south and a dual carriage way to the north. Traffic is extremely congested as the road across Kooragang Island is the main arterial route to Newcastle from the growth areas of Medowie and Nelson Bay to the north as well as the more established residential area of Stockton to the East. Access to the Island would be severely restricted in the case of any emergency. Routinely, with present traffic flows it can take 20 minutes to drive the 3 kilometres across the island at peak times. Minor traffic accidents or breakdowns can lead to extensive delays. The nearest emergency services are located at Mayfield to the south and Stockton to the East. In both cases, if required, the services would need to cross bridges and access roads that are already very congested and regularly become grid-locked if there is any disruption to traffic flow.

Similarly, any requirement to evacuate some or all facilities on the island would prove nearly logistically impossible due to the restricted access on and off the island and the already heavy traffic flow. Again, there seems to be a lack in a coordinated approach to evacuation and OH&S processes in facilities across the island. This lends further evidence to the need for overall planning for the island rather than haphazard one-off development proposals and EISs.

Of course, the overall safety and evacuation processes for local residents must be a major consideration. If there were a major environmental incident on the island, Stockton residents are in the untenable position of needing to drive towards the incident to drive in a northerly direction off the Stockton peninsula towards safety.

Is the risk of an explosive incident involving destabilised ammonium nitrate high enough to warrant concern? Most definitely, there are 25 major incidents recorded in the last 100 years with killing and injuring hundreds of people. It is worth noting that the most catastrophic of these were in Germany and Texas, USA where in each incident several hundred people were killed. In both cases the amount of ammonium nitrate involved was far less than the 350,000 tonnes proposed by Incitec Pivot Limited.

Storage, loading and transport of the ammonium nitrate pose additional threats. The EIS needs to further explore and provide additional risk mitigation strategies for the road transport of the ammonium nitrate to the Hunter Valley and beyond. The New England Highway to the west is already experiencing extreme traffic congestion due to the expansion of coal mining in the Hunter Valley. Much of this road is through suburban and residential areas. Newcastle Harbour is the busiest in Australia. A considerable number of the environmental disasters involving ammonium nitrate have involved loading and transport.

I implore the NSW Dept of Planning and Industry to require Incitec Pivot Limited to address these major safety concerns and I strongly recommend that the Department adopt a more integrated approach in the consideration of development approvals on Kooragang Island.

Amanda McLaughlan Dip Ed(Sc), M Ed(hon), Dip Env Stud, Dip T

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