



Submission to the New South Wales Department of Planning re SSD-33042483 Manildra - Port Kembla Bulk Liquid Terminal August 2022

Background Information –

The Keiraville Resident Action Group was reinstated in April 2019, following increasing concerns of overdevelopment in the Village of Keiraville. The original KRAG was in operation a decade earlier. The reformed KRAG incorporated on 10 May 2021.

KRAG Inc. is a not-for-profit community association, presently comprised of a voluntary committee of management with no paid staff. The Management Committee consists of 8 members who operate in consultation with over 200 residents, and on resolutions of 5 locally held Public Meetings to date.

Organizational Structure –

The Association's consists of registered members and management committee including:

Chairperson – Geoff Kelly
Vice Chairperson – Felix Bronneberg
Secretary – Yvonne Toepfer
Treasurer – Elizabeth Keenan
Public Officer – Karen Rispoli

Mission Statement -

“To act as a conduit through which residents can raise matters pertinent to the amenity of their suburb and voice their opinions and desires about future character and directions for Keiraville.”

“To act as vehicle by which residents can collectively respond to issues concerning Keiraville’s suburban environment and infrastructure within the context of the City of Wollongong and the wider Illawarra region.”

Vision Statement –

KRAG aims to be an effective lobbyist association targeting Local and State Government and other institutions such as UOW as required, in collaboration with like-minded groups, and capable of bringing attention to and changing outcomes of concern for Keiraville and Illawarra residents.

Submission

The KRAG Inc Committee at its meeting of 9 August 2022 agreed to raise concerns including: the proposal by Manildra to use extra large A Double trucks on public roads between Bomaderry and Port Kembla (including the dangerous Kiama Bends) to move up to 200 million litres of ethanol each year, and the very scant attention given by Manildra and its consultants to even consider the use of rail, despite the NSW Government having invested \$40 million in upgrading the track between Kiama and Bomaderry to accommodate more freight trains, with heavier axle loads.

KRAG Inc acknowledges that Port Kembla plays a vital role in the NSW economy. However, KRAG Inc is concerned that there is already a large number of trucks moving coal, cars (in car carriers) quarry products, cement and other commodities and objections to putting even more trucks on busy roads and rail is dismissed by a claim in the EIS that *"Road transfer is required due to limited capacity and shared passenger services on the South Coast rail corridor."*

Are they serious? In July 2022, a TfNSW media release explained that the NSW Government had just completed \$40 million rail upgrade to 13 kilometres of track on the South Coast Line to a 25-tonne axle loading between Berry to Bomaderry and the tunnels between Kiama and Berry (see <https://www.transport.nsw.gov.au/news-and-events/media-releases/40-million-rail-upgrade-south-coast-line-complete>). Here, the Minister for Regional Transport and Roads, the Hon Sam Faraway MLC said the upgrade will play a significant role in ensuring more freight can be transported by rail in NSW.

This should extend to Ethanol for export through Port Kembla.

This Media Statement of July 2022 also includes a spokesman for Manildra saying: "The track upgrade to 25-tonne axle loading between Berry to Bomaderry and the tunnels between Kiama and Berry allows our company to operate heavier and longer rail services through the network..."

KRAG Inc shares the concern of Wollongong City Council in its resolution of 1 November 2022, and that of its Neighbourhood Forum 5.

We would add that rail transport produces about one third of the emissions that trucks do for many freight tasks, and reduction of emissions is an objective shared by the Australian and NSW Government.

KRAG Inc requests that Manildra be required by the Department of Planning to examine the costs and benefits of using rail instead of large trucks and that in any event, if the export facility at Port Kembla is allowed to proceed with road transport, then strict conditions must be placed on truck movements as to permissible roads, hours of operation, standard of trucks (to meet latest European standards) and a contribution to the repair and maintenance of Council and main roads; also that the facility must be future proofed to allow rail to be able to be used at a later date, or when export tonnages exceed a certain threshold (eg 40 million litres a year).

KRAG Inc would also request that the Minister for Planning consider having the Independent Planning Commission to assess the proposal to use road transport. If this is not possible, we request that the Independent Planning Commission provide independent advice on the proposal to use road transport, and then take that advice into making his decision.

Geoff Kelly
Chairperson
KRAG INC.