

Executive Summary

The activity for which approval is sought presents a potential risk to human health through the release of crystalline silica dust into the atmosphere. The Application does not address the risks presented by the dispersal of silica dust associated with the Proposal on human health within the Site and on adjoining land.

Jacfin submits that the impacts of the Proposal cannot be properly assessed until a human health risk assessment has been prepared and submitted. In the absence of such assessment, the Department cannot be satisfied of the impacts of the Proposal as required by s4.15(b) of the *Environmental Planning and Assessment Act 1979 (Act)*.

Background

The Jacfin land is currently the subject of a number of development approvals for industrial purposes in accordance with its zoning under the *State Environmental Planning Policy (Western Sydney Employment Area) 2009*, and also for the extension of Eastern Creek Drive. Eastern Creek Drive will ultimately connect into the Archibald Road Extension, creating a main arterial connection to the M7 motorway to the north and the M5 motorway to the south.

Human Health Impact

The Environmental Impact Statement prepared by Ethos Urban dated 15 March 2021 states that the Proposal will receive waste from Hanson's various concrete batching facilities around Sydney, as well as other source separated construction and demolition waste. The waste stock is expected to comprise; concrete (~70%); bricks (~5%); asphalt (~10%); and glass (~15%).

Silica is found in varying degrees in many construction materials including aggregates, mortar, concrete and stone. Specifically, figures published by SafeWork NSW indicate concrete and mortar may comprise between **25-70%** silica, and brick may contain up to **30%** silica. As mentioned above, concrete and brick are proposed to comprise **75%** of the Proposal's waste stock.

The risk posed by silica to human health occurs when products containing silica are disturbed or broken down so as to create dust. If respirable, the silica dust is aggressive and lung damaging when able to penetrate into the lungs in sufficient quantity. Silica is known to cause serious lung damage and disease, such as silicosis. Advice published by the Cancer Council of Australia also indicates that exposure to silica may lead to lung cancer.

The risks of working with silica are documented in the '*Health monitoring: Guide for Crystalline Silica*' prepared by Safe Work Australia (**Guide**). The Guide outlines activities which are at a higher risk of the production of respirable silica dust. It is clear from the categories listed in the Guide, that activities which involve the breakdown, cutting, or demolition of silica containing material create a higher risk of exposure. Such activities, amongst other things, include:

1. construction and demolition works;
2. jack hammering and chiselling of concrete; and
3. clean up of dust by sweeping or pressure blowing.

The activities proposed to be undertaken on the Site are likely to produce a similar dust profile as those activities listed above and in the Guide.

The Guide further states that non-occupational exposure to silica dust can occur when neighbouring industrial sites produce high quantities of silica dust. Accordingly, it is apparent that given the waste stock and crushing activity to be undertaken on the Site, there is a material risk of human exposure to silica dust.

Based on our review of the Application, no assessment or consideration has been given to the risk of silica dust exposure on the human health of its employees and the broader community within the immediate locality.

It is absolutely necessary that the Proponent prepare a human health risk assessment to allow the Department, Jacfin and community stakeholders to understand the human health risks of the Proposal. Until such assessment is prepared, the Department cannot properly assess the impacts of the Proposal as required by s4.15(b) of the Act.

Yours faithfully



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