

Mining and Industry Projects
Department of Planning and Infrastructure
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Attention: Mr Nick Hall
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This is a submission objecting to the proposed Incitec Pivot Ammonium Nitrate manufacturing facility on Kooragang Island (SSD-4986).

I am personally opposed to this development for a number of reasons.

I moved to Newcastle in 2002 and Stockton in 2003, having spent the previous 10 years living in various parts of Australia, working in various jobs and starting a family. My family decided to move to Newcastle, and specifically Stockton, as we felt that it would provide a great environment to bring our children into adulthood. We felt that this area "ticked all our boxes": there were many potential jobs for my husband, myself and children when they became old enough; many educational opportunities including a University for our children; great proximity to Sydney; a beach and all the opportunities that a small town near the CBD of a city can offer. With the closure of BHP in 1999 and assurance from the EPA and local residents that there was minimal pollution "less than in most areas of Sydney" we made the decision and moved to Stockton.

This decision has been a wonderful one for our family. All the advantages of living in a small town near a city have been realised. As well as all the things we were hoping when we moved to Stockton, our children have grown up with a great sense of community and connection. Our move has been so positive, that 3 other sections of our extended families have moved to Stockton.

All this feels at risk with the growing number of polluting industries being licensed to operate on Kooragang Island.

Since the leak of hexavalent chromium into the atmosphere by Orica in August last year, we have felt under siege by industry and pollutants coming from them. Since August 2011, we have had to contend with an unlicensed ammonium release and arsenic release by Orica and naphthalene by Koppers.

I am horrified that the Department of Planning is considering yet another potentially polluting industry in the form of Incitec Pivot's proposed ammonium nitrate facility. Stockton and other surrounding suburbs are after all zoned "residential" and should not have to contend with pollution levels that seem to increase with each additional development on Kooragang Island.

When we moved into the area, I realised that Orica had an ammonium nitrate plant, but had no idea that this was a material that was used to make explosives. Since August 2011, I have become much more educated about this product and the damage that can be caused with it. I find it hard to believe that this development was ever approved so close to a residential area and a CBD. I find it harder to believe that there has been approval granted to extend this facility and harder again to understand that another ammonium nitrate plant (Incitec) could possibly be considered. I understand that the government needs to look at economic viability but surely its primary duty is to consider the safety and well being of constituents and not to place them at undue risk.

My main reasons for objecting to this proposed development are:

Explosive risk:

The combined total of ammonium nitrate planned to be stored on Kooragang Island (Orica and Incitec Pivot), within a very small area, is 21 500 tons.

I find this positively frightening. I realize that ammonium nitrate in itself is not an explosive, but I also realize that it can be turned into an explosive very quickly by a number of different means. This could occur accidentally (eg by shock waves, earthquake, fire), or on purpose (eg by terrorist attack). I am aware that Manildra is looking to store biodiesel and other fuel, very close to the Orica and Incitec sites. I am also familiar with the huge coal stockpiles and the proposal to build a fourth coal loader on Kooragang Island. This island houses a lethal cocktail of ingredients if there was a major accident or incident.

I feel that living with this risk is just unacceptable. I am aware of many explosions that have occurred around the world involving much smaller amounts of ammonium nitrate. These explosions have killed and injured a number of people and caused great damage to infrastructure.

I am also aware that the explosive power of 21 500 tons of ammonium nitrate has a similar explosive power to that of the Hiroshima atomic bomb.

I believe that government has a duty of care to its people to not place them in a position of unacceptable risk. Surely the government has a responsibility to protect its people.

It appears that different State Governments in different states of Australia have very different understandings of the risk of having stockpiles of ammonium nitrate close to other stockpiles of ammonium nitrate and to residential communities.

The Western Australian Government Code of Practice on Safe Storage of Solid Ammonium Nitrate Second Edition includes a table with separation distance from various quantities of stored ammonium nitrate from off-site protected works, vulnerable facilities and critical infrastructure. If this Code was applied to the storage of ammonium nitrate on Kooragang Island, the

infrastructure would include key port facilities, coal terminals, Stockton Hospital, schools, childcare facilities and dwellings and Stockton Bridge as a key link to Newcastle airport. Applying this Code of Practice, a development of the type that is being proposed on Kooragang Island could not begin to be considered.

In South Australia, the State Government is negotiating with Incitec to shift their Port Adelaide storage of ammonium nitrate to a location away from residents.

As we have already seen with industry on Kooragang Island, accidents do happen and surely the government should be erring on the side of caution.

Increased traffic:

My family is directly affected by the already increased traffic on Kooragang Island. Three of my children catch a bus daily across Kooragang Island to get to school in Mayfield. My husband and I also often commute across the island into work. Already we are regularly late for school and work because of traffic on Kooragang Island. Traffic is often at a standstill particularly where the two lanes merge into one.

In the Environmental Impact Statement, Section 15.3.2 deals with existing traffic volumes. There is no mention of the large residential growth planned for Fern Bay and Fullerton Cove, which will add to the traffic volumes across the island. There is an estimate of background traffic growth of 2.5%, which surely does not take into account these developments. There is also no mention of this roadway being the major thoroughfare between the growing airport and Newcastle. The figures that have been used are figures from 2010. There has been a great amount of growth in the area since then.

In addition to extra vehicles to transport workers and residents, with this proposed development, there will also be an additional estimated 35 heavy truck movements daily on the roads in question, with many of these trucks loaded with ammonium nitrate. These roads are already over their capacity. They cannot cope with additional traffic, especially when some of this additional traffic will be carrying ammonium nitrate.

Inadequate community consultation:

There has been inadequate community consultation around this proposal. The “consultations” that have occurred have been one sided ie: Incitec has told the community what is going to do. They would be more correctly termed “information sessions”. Before the EIS was on exhibition, the Stockton community had received one community information session – this does not constitute ‘consultation’.

The concerns that residents have expressed, have not been dealt with in a satisfactory manner.

Noise near a residential area:

In Section 11.4.3, the EIS states that:

“Whilst the appropriate zoning in Stockton is recognized as suburban, considering the adjoining industrial zone it must be noted that a suburban/industrial interface exists. The INP does not provide recommended industrial noise levels for suburban/industrial interfaces and therefore it is considered appropriate to relax the recommended levels for suburban areas by 5a dB.”

It appears that the EIS is recommending that Stockton’s zoning should be completely ignored. The attitude that is apparent in this section of the EIS appears that, since Stockton is already receiving over and above the noise that a suburban area should be subjected to, and since the government allows this, then they should just allow more.

Residents of Stockton do not see themselves as a suburban/industrial interface. We see ourselves as living in a beautiful beachside community. We are already subject to too much industrial noise.

Heightened threat to air quality:

In the 10 years that I have lived in Stockton, I have noticed an increasing amount of air pollution. We can see this on our cars and houses.

The accumulation of polluting industries on Kooragang Island has a huge effect on the air quality of all suburbs surrounding the Port of Newcastle.

As a submission maker, I can confirm that I have not made a political donation totalling \$1000 or more in the past 2 years.

Kate Johnson