

Nicholas Hall - Planner
Mining and Industry Projects
Dept. of Planning and Infrastructure
GPO Box 39
SYDNEY 2001
Nicholas.Hall@planning.nsw.gov.au

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Dear Sir

PROPOSED AMMONIUM NITRATE PLANT ON KOORAGANG ISLAND

I am a resident of Stockton and I write to object to Incitec Pivot's proposed ammonium nitrate plant on Kooragang Island (SSD-4986). My principal concerns are these:

1) A residential area is not the correct location for such a development

- the development will create an unacceptable health and safety risk to Newcastle and nearby residents

2) INCITEC has failed to address the environmental impacts of the proposal.

- INCITECS Environmental Impact Statement does not satisfactorily address my concerns of explosive risk, noise, air and water pollution and possible impact on house values.

A) GENERAL OBSERVATIONS

- a) The industrial development taking place on Kooragang Island is failing to consider the cumulative impact that such large scale growth is having on Newcastle and the suburbs that surround the Port
- b) It is essential that a holistic and responsible planning mechanism be established to assess all present and future development on Kooragang Island.

The mere thought of two ammonium nitrate plants, operating side-by-side just 800 metres from residents is a perfect example of the lack of due consideration given to a proposal that would allow a concentration of high risk industrial activity that I understand is to be found nowhere else in the world.

- c) I do not object to the existence of industrial activity on the Island but expect that such pursuits be carried out in a safe manner and volume, and following a fully disclosed assessment of the extent of all implications for the neighboring communities.

B) MY INDIVIDUAL CONCERNS

The potential consequences of the proposal upon my family include:

1) Potential for explosion

It is proposed to manufacture and store dangerous chemical material and similar plants in other locations have experienced explosions.

Incitec's EIS fails to adequately address my concern about the potential risks of storing 21,500 tons of ammonium nitrate (maximum storage capacity combining Orica and Incitec). The blast contours in Incitec's EIS do not even reach Stockton, yet it's well known that an ammonia nitrate explosion involving 300 tons of ammonium nitrate in Toulouse, France, killed 33 and injured thousands within a 5km radius in 2001.

I am aware that ammonium nitrate is an oxidising agent, not an explosive; however, it can be turned into an explosive both quickly and easily by shock waves, foreign matter, heat and pressure. Whilst the risk of explosion is small, the impact of an explosion would be catastrophic and despite slogans in Incitec's EIS of "world's best practice" accidents do occur, take for instance Orica's Hexavalent Chromium leak in 2011.

One of the fundamental responsibilities of any Government is the welfare and protection of people and this proposal undermines the safety of around 50,000 residents within a 5km radius. Government should note that if Incitec proceeds there is enough explosive power on Kooragang Island to match the Hiroshima atomic bomb (Hiroshima used 18,000 tons of TNT which is comparable to the 21,000 tons proposed by Incitec and Orica's current capacity).

The Department of Planning must also acknowledge that the South Australian Government is trying to shift Incitec's storage of AN in Port Adelaide due to explosion risk for residents, which is outlined by a SA WorkCover report. Such a massive concentration of ammonium nitrate storage within 800metres of residents is not acceptable to the communities that surround the proposal.

Incitec's EIS fails to openly identify and explain the risk for Newcastle of having the largest concentration of ammonium nitrate in the world considering that this is a preferred and widely utilised material by international terrorists for the making of explosives. The World Twin Towers attack demonstrates that a terrorist organisation set on the destruction of a target can easily circumvent all security arrangements. In

my opinion, Incitec's Environmental Impact Statement fails to identify the full potential of neither this risk nor the security arrangements that would prevent any such occurrence.

Australian Governments recognize that the risk of terrorist action on Australian soil is real. The largest concentration of ammonium nitrate in the world that would result from the building of the proposed Incitec plant therefore presents two major terrorist risks: One as a rich source of such material; the other as a target that would capture world attention.

2) Air Pollution

The facility has the potential to aggravate existing high levels of air pollution.

Having lived with air pollution for many decades I am deeply troubled by the fact that Incitec's plant will add to the already deteriorating air quality in the Newcastle area. Stockton residents experience high levels of coal dust from PWCS and NCIG, diesel particulates from industry and nitrous oxides from Orica's plant. Two large scale ammonium nitrate plants, operating so close to residents creates an especially high concentration of NOx gases that are detrimental to respiratory health, especially the young and elderly.

Orica's expansion and Port Waratah Coal Services' T4 proposal, further impacts future air-quality and Incitec's Air Quality tests do little to abate my concerns regarding air pollution.

3) Noise pollution

The facility will increase already unacceptable levels of noise pollution.

Industrial noise, especially nocturnal noise, is already a major concern which impacts on me personally. To be able to sleep at night I am forced to close all windows and doors facing west to reduce noise levels during night-time. Incitec's EIS noise monitoring of the site was conducted when Orica's ammonia plant was not in operation and proved that Orica is not meeting acceptable noise levels.

Indeed, Incitec in their EIS argues that "it is appropriate to relax the recommended levels for suburban areas by 5db".

Here are some extracts taken from different sections of Incitec's EIS on Noise.

"As the existing level of industrial noise exceeds noise amenity criteria recommended by the EPA's Industrial Noise Policy (INP) by a significant margin, alternate operational noise criteria has been nominated for the Project.

"Whilst the appropriate zoning in Stockton is recognised as suburban, considering the adjoining industrial zoning it must be noted that a suburban/industrial interface

exists. The Industrial Noise Policy, 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 5db.

"Given that IPL and Orica are the only two operators that could materially influence industrial noise, it's is proposed the adjacent sites assume an equal responsibility in achieving the nominated levels."

As a resident personally affected by noise from Orica and PWCS, I find the assertion of Stockton being an 'interface' suburb offensive and the idea for government to 'relax' noise limits a backward step.

How can industry be trusted when Orica are well above night-time noise limits and Incitec are requesting special considerations?

4) Inadequate Consultation

The process of community consultation undertaken by INCITEC has been manifestly inadequate.

Many residents from Stockton, Carrington, Tighes Hill and Mayfield have been left in the dark on this project. Letter drops and one information session two months after the Orica disaster is not proper consultation for a project of such magnitude and widespread impacts.

Incitec's own 'community perception' survey conducted in April 2012, identified less than a third of residents were aware of the Project. Another example of poor consultation is that residents who live within the outer rim of a 5 km radius have been excluded in any communication material. Suburbs such as Cooks Hill, Newcastle West and East, The Hill and Hamilton South have received no information regarding the proposal.

Now that Incitec has declared a two year delay in making any decision on the Project, residents of surrounding suburbs face ongoing uncertainty and local investment is stymied.

5) IMPACT ON HOUSE PRICES

ICITEC fails to properly consider the detrimental effect of the application on the surrounding property market.

Incitec's EIS fails to address my concern that a second ammonium nitrate plant may impact on house prices. If Incitec's development is approved, the risk profile increases for all suburbs close to Kooragang and it's highly likely that the value of properties will decrease. Downward pressure on property values would be a direct result of the decrease in families moving into areas like Stockton and the stigma attached to those suburbs close to two ammonium nitrate plants.

Incitec's EIS does not acknowledge this issue, nor does it address who would be responsible if property values were lowered by their Project.

6) TRAFFIC IMPACT

The proposal will increase already unacceptable levels of traffic congestion

Traffic is already a major problem as a result of industrial activity on Kooragang Island. Incitec's EIS does nothing to mitigate the traffic problems that would arise during construction and when the plant became operational.

In addition to congestion, the extra diesel truck movements will add to dangerous carcinogenic fine particles and nitrous oxides levels.

7) Employment and economic impacts in Newcastle and Lower Hunter

The proposed economic benefit to the community is not commensurate with the potential environmental effects of this proposal.

If operational, Incitec's plant will employ just 60 people, many of whom will be transfers from the company's Mooranbah ammonium nitrate plant. Considering the risk and impact the plant brings to tens of thousands of people, 60 jobs are not commensurate.

Furthermore, Incitec have stated that rising construction costs and a failing coal price have forced a two year delay in making a decision on this Project. These outside economic forces impact on the viability and longevity of the plant and should be included in the EIS.

8) Water Pollution

The proposal will contribute considerably to the levels of water pollution in the Hunter River.

It is a well established fact that in addition to the pollution caused by the industries on Kooragang Island the estuary of the Hunter River is the recipient of pollution caused by large mining and industrial developments along the full length of its course. Yet Incitec will be handed another license to pollute the river. If Incitec truly wants to build a world-class plant then their EIS should reflect a plant with no effluent into the Hunter River.

The river is an important recreational estuary for thousands of fishermen and water sports participants, not to mention that Kooragang is an international recognized RAMSAR wetland.

Excessive industrial development with a license to pollute the river close to a RAMSAR area is not environmentally responsible planning, nor does it position the Hunter River in a positive light to tourists. Tourism is already an important source of employment in the Hunter Valley with the potential for further growth around the Port of Newcastle thus adding to the diversity of its economic base and employment opportunities.

CONCLUSION

On the basis of the above submission, we ask that INCITEC's proposal be rejected on the basis of the inadequacy of the Environmental Impact Statement.

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

Yours Sincerely,

