

Oct 25, 2012

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Dept. Of Planning and Infrastructure  
GPO Box 39  
Sydney 2001

**RE: SSD-4986**

Dear Sir;

This letter carries my submission in relation to Incitec Pivots proposed ammonium nitrate plant for Kooragang Island. (SSD-4986)

I wish to object Incitec Pivots proposal on the following grounds;

- Potential for explosion.
  - There is no adequate reference in Incitec's EIS to address the risk of explosion from stored ammonium nitrate on Kooragang Island to surrounding residents or existing industries, nor is there any detail of any emergency management plan in case of such an explosion. The potential risk to not only some 10,000 residents that live within a 5km radius of the proposed plant but also risk to the largest coal port in the world is unacceptable.
- Terrorist Risk.
  - Newcastle port was responsible for more than \$20 billion in export revenues to 30<sup>th</sup> June 2012. A terrorist attack on the existing Orica plant would have significant impact on state and federal revenues due to disruption of Newcastle port. Adding another plant next door to the existing plant would increase this risk. Incitec's EIS does not address this unacceptable risk.
- Inadequate Licensing and Penalties.
  - Current licensing, and penalties for breaching EPA licenses is inadequate, this is demonstrated by the current ammonium nitrate producer, Orica, having breached its license terms 88 times since 2000 at its Kooragang Island facility alone. The release of carcinogenic and toxic substances including Arsenic, Mercury and Hexavalent Chromium into the surrounding environment on multiple occasions by Orica clearly demonstrates that existing penalties do little to ensure compliance with licensing terms. Whilst the actions of Orica are not indicative of the

actions of Incitec, the inability of the EPA to modify poor corporate behaviour is clearly evident and gives me little confidence that if Incitec were to breach its license terms, the EPA would have adequate power to ensure future compliance.

- Air Pollution.
  - Air pollution in Stockton and surrounding suburbs is adversely impacted by a number of industries causing high levels of coal dust in the air, diesel exhaust from road and shipping and high levels of NOx from the Orica plant. Adding to the already high pollution levels is unacceptable.
- Noise Pollution.
  - Noise from industries already located on Kooragang Island is already at a high level and night time noise is affecting many residents sleep patterns and health. To not only add to this but request a relaxing of noise restrictions by 5db is unacceptable and insulting to nearby residents.
- Traffic Impacts.
  - Increased traffic on and off the island has not been adequately addressed by the EIS nor is there an emergency management plan in place to deal with the closing of the one road into and out of Stockton if there was an emergency caused by gas leak and/or explosion. This is an unacceptable risk that has not been addressed.
- Reduction in amenity to residents.
  - Whilst amenity is potentially subjective, the general community perception is that amenity of Stockton and surrounding suburbs will be further reduced by an additional ammonium nitrate plant built less than 800m from residents. Incitec's proposal makes no mention of the reduction in amenity to residents or any measures to compensate for any losses to property values of nearby residents.

I can see no reason that Incitec cannot build its plant at a location closer to its customers in the Hunter Valley, thereby reducing risks associated with transport of ammonium nitrate, and further away from built up residential areas, reducing the risks I have outlined above.

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,