

PORT KEMBLA POLLUTION MEETING

c/- 203 Wentworth Street, Port Kembla NSW 2505
Telephone: (02) 4276 2715
Email: pkpm@optusnet.com.au

The Director – NSW Planning

16/12/19

Att: Rose-Anne Hawkeswood

Re: Modified DA Port Kembla Gas Terminal CSSI 18 9471

The Port Kembla Pollution Meeting (PKPM) has received notification that a modification to the above proposal has been submitted.

We (representatives of the Port Kembla Community) have met with AIE in the past and through those discussions we were informed of various aspects of concern of the proposal, namely dredging, safety, volatility, risk of explosion and the environmental impacts of cooling water.

We have reservations about the control over each of the above and the level of risk associated with each of the above. We rely on planners and administrators to make sure that adequate controls and limits are placed on the project.

The fragmented tactical approach by developers to lodge a DA using “small numbers” to limit the interest in their project then submit a modification which changes the project significantly should not be permitted.

As is the case in this instance we argue that this project (AIE PK Gas Terminal) now needs complete reassessment as it could readily be seen as a new project in that the volumes proposed in the modification greatly change a large number of facets of the original proposal.

In other words to double the number of vessels doubles the volume of product which doubles the environmental impact and doubles the risk.

When we speak of environmental impact we mean the potential impact of the revised volume of cooling water that will be released into the harbour. The public are smart enough to realise that to say the impact to the harbour environment is minimal is false. We probably do not fully

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understand the total and long term impact of the release of cooling water into Port Kembla Harbour, particularly in the volumes now proposed.

When we speak of risk we mean that the Illawarra is congested with highly volatile industries and to double the through put of gas significantly increases the risk of explosion, terrorism and devastation of the Illawarra. The public are smart enough to understand that there is a risk of terrorism and /or explosion (intentional or not) with gas pipelines and to say it is not an issue is false.

A new 37 kilometre pipeline also changes the project significantly in terms of the environmental impact during its construction and the footprint that it will consume as well as changing the risk factor of the whole project in terms of the potential risk of explosion or interference anywhere along that 37 kilometres of pipeline and the return of that explosion back to the source at berth 101. What would happen then would be catastrophic.

We have previously written to the Planning Minister with our concerns about the congestion of volatile industries in The Illawarra and we enclose a copy of that letter with this submission.

We also enclose a copy of a chart which details the location of highly volatile industries in very close proximity to each other including the proposed Hydrogen Generation Plant which has been rumoured to be located right next door to the Port Kembla Gas Terminal.

In light of our very real concerns about the Illawarra being a potential bomb and the fact that AIE have surprisingly submitted a DA modification a few months after the initial DA (with the potential for further modifications if things change again); we ask that the modified DA be completely re assessed and treated as a new DA.

With that assessment we ask that international terrorism agencies be consulted, master plans be developed for the potential catastrophic destruction of parts of the Illawarra and most importantly we ask that Governments set up a task force to examine the economic impact of a major catastrophic event on the economy of Illawarra , NSW and Australia.

We acknowledge that there is a need for energy supply (but that is predominantly due to Governments selling off Australia's resources) and we acknowledge that there are inherent dangers in heavy industry but given the adhoc approach to development in the Illawarra with regard to

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volatile industry we wish to now object to this proposal and ask for a complete reassessment with consideration of the above and consideration of the agglomeration of volatile industries in the Illawarra.

Thank you for your assistance in this matter.

Mark Peterlin
For and on behalf of PKPM.

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Telephone: (02) 4276 2715

Email: pkpm@optusnet.com.au

Department of Planning Industry and Environment
Director Southern Region
Att: Ms Lees

sarah.lees@planning.nsw.gov.au

20/10/19

Hello Sarah,

ref: MDPE19/2711

The Port Kembla Pollution Meeting (PKPM) has recently written to Mr Scully and Mr Stokes expressing concerns regarding the future development of Port Kembla Harbour and adjacent areas.

Of particular concern to the PKPM committee members are those developments that fall under the Three Ports Sepp and the means by which those developments are approved.

Our primary concerns are:

That complying development proposals are initiated, developed and progressed to approval stage without notification to the community which in turn means it is not possible for the community to effectively assess and have input into these proposals before commencement of construction.

That under The Three Ports SEPP the State Government can (and has) allow(ed) development proposals to proceed by permitting private certification without full and transparent public consultation of D.A.s.

That because NSW Ports is now a leased enterprise there is an appetite to develop Port Kembla Outer Harbour, meaning that for NSW Ports any revenue stream is better than none and consequently any business, regardless of its impact on the community, may be allowed to proceed.

Also,

Mr Stokes, in his letter (referenced above), says “ Further proposed amendments to the 3 ports SEPP seek to unlock additional and essential routine

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development potential to be assessed and determined via a streamlined approval pathway such as exempt and complying development.”

We understand the benefits of growth BUT complying developments do not permit any community consultation.

Mr Stokes says “Complying developmentmust meet strict conditions and criteria.” The vague application of “strict conditions and criteria” gives no comfort to a community that has endured decades of being poisoned by many industries that have had “Strict license Conditions and Criteria” written into their licenses yet those same industries perpetually assaulted the community with their toxic fumes and fallout.

Mr Stokes also says “ Any major development of a contentious nature will include opportunities for community consultation.”

We have concerns about what criteria will be used to determine whether a proposal is major, contentious and significant. These terms are too vague to offer the community any certainty that full and genuine consultation will occur.

The Port Kembla Pollution Meeting Committee members seek reassurance that all future development (and those in the pipeline already) for Port Kembla Harbour and precincts will be fully disclosed to the community and that genuine consultation be afforded to the whole community.

This would mean that the Port Kembla / Illawarra community are given full details of the project, full details of the applicable controls, details of the planning process to be considered, details of license conditions and -if not licensed- details of why it is not licensed. Most importantly the community expects to be afforded the opportunity to analyse and comment on all developments applications.

Further to these concerns and most alarming to the Illawarra community is the aggregation of highly volatile industries in Wollongong.

Illawarra is now home to:

- Two volatile grain handling facilities,
- One volatile fuel depot (adjacent to the two grain facilities),
- One volatile coal terminal,
- One sewer treatment plant (potentially volatile),
- One large volatile fuel storage farm,
- One volatile fuel oil berth,
- One acid processing plant (potentially volatile),
- One acid berth
- One volatile LNG processing facility (proposed),
- One volatile hydrogen power plant (proposed),
- One asphalt plant (proposed),
- One highly volatile fertilizer plant (proposed),
- Two volatile extremely large gas storage tanks,
- One volatile gas processing plant ,

**One coal tar facility,
One volatile blast furnace and associated volatile infrastructure**

All these facilities are contained within a 2.5 by 3.5 square kilometre area and are dispersed amongst a web of pipelines carrying their volatile products; and the city of Wollongong and residential area surrounds all the above . See the attached chart.

It should be evident that approval to construct and operate major or minor facilities should not be performed in isolation from other developments and that by allowing complying developments without community consultation is denying the democratic process, which evidently opens the door to a potentially dangerous and perhaps catastrophic situation for Wollongong and its residents.

The Port Kembla Pollution Meeting has lodged objections to the use of private certifiers and Complying Developments both to parliamentarians, NSW Ports (through the PK Harbour Environment Group) and the SEPP review that occurred recently.

The Port Kembla Pollution Meeting remains steadfast in its objective to work co-operatively with industry and government. The committee does not object to the establishment of industry but we DO object to the negative impacts that industry may have on the community.

We would like to point out that the Port Kembla Pollution Meeting has been dealing with pollution issues for more than 30 years. All these pollution issues have been born from vague interpretation of ineffective license conditions, corporate persuasion over governments and false promises of “Strict governance” by politicians.

In other words the Port Kembla Pollution Meeting Committee members have seen it all before and as a consequence the community are very engaged, aware, enlightened and wary of false promises.

We believe our concerns are very real and that there is potential for catastrophe as has been evidenced by recent incidents of major fires within industry and the ongoing problem of an underground fire at Cringila Public School which has been burning for years.

**Yours faithfully
Helen Hamilton /Mark Peterlin
for and on behalf of PKPM**

**cc Minister Stokes,
cc Minister Paul Scully,
cc Lord Mayor Gordon Bradbury**

