

EIS for SSD6395 – Objection

Submitted by: Robert Goldsworthy
Date: December 7, 2018

I wish to object to the following items specifically. Please note that this does not represent all of my objections, however I understand that there are numerous objections from concerned residents that touch on many of my other objections.

The certificate on page 3 of 803 states:

*“(ii) the statement contains all available information that is relevant to the environmental assessment of the development, activity or infrastructure to which the statement relates, and
(iii) that the information contained in the statement is neither false nor misleading.”*

I believe that all available information that is relevant has **not** been included, and that some of the information contained within the EIS submission is **misleading**. I will keep my focus on one in particular.

Information supplied on pages 110-111, in relation to SEPP 33, **Hazardous and Offensive Development**, the application states:

“The proposed development is not considered to be characterised by any of the above land use definitions.”

These are the definitions:

*“**potentially hazardous industry means** a development for the purposes of any industry which, if the development were to operate without employing any measures (including, for example, isolation from existing or likely future development on other land) to reduce or minimise its impact in the locality or on the existing or likely future development on other land, **would pose a significant risk** in relation to the locality:*

- a) **To human health, life** or property, or*
- b) **To the biophysical environment,***

And includes a hazardous industry and a hazardous storage establishment.”

*“**potentially offensive industry means** a development for the purposes of an industry which, if the development were to operate without employing any measures (including, for example, isolation from existing or likely future development on other land) to reduce or minimise its impact in the locality or on the existing or likely future development on other land, **would emit a polluting discharge** (including for example, noise) in a manner which would have a significant adverse impact in the locality or on the*

existing or likely future development on other land, and includes an offensive industry and an offensive storage establishment.”

By definition contained in SEPP 33, this **is** considered a hazardous and offensive industry. Documents attached will demonstrate that the dust from the product, silica sand, **is** hazardous. Documents include SDS (please note that since the inception of the GHS system in 2017, silica has been classified as “dangerous”, particularly the dust generated during extraction operations as well as the concentration) as well as Health Department fact sheets and Occupational Safety information.

The barriers recommended in this EIS will **not** ensure that the exposure of residents will be protected. Furthermore, the operational hours will **not** ensure that the dust generated from this activity is contained outside of the hours of operations, not during the hours of operation either, thus exposing residents to silica dust 24 hours of every day. This proposed development **does** pose a risk to human health, life, and property.

On page 695 of the application, the composition of this sand is >97% Silica (SiO₂) in all categories.

It has been known for decades that silica dust is a carcinogen. It is classed as “Dangerous” by all Governmental and Health Authorities within Australia, and I believe this may attract the same “dangerous” classification globally but certainly those that are a part of the Global Harmonization System (GHS). This is not something that can be overlooked. It causes diseases, including Silicosis, which are not curable and result in death. Limitations are imposed by Government for maximum allowable levels. (see attached specifically for the Australian Standard)

What, if any, action will the developer take to ensure the safety of residents within the vicinity of this proposed development?

The recent wind storm that blew particles all the way from Broken Hill to Sydney, a distance of over 1,100km, should be a warning of the potential of deadly silica dust. As too should be the Asthma Storm that killed residents of Melbourne.

These two dust storms mentioned were not common events. The residents of Bobs Farm are not living 1,100km from the source of what is a known carcinogen and will be exposed to it 24 hours a day.

Are Government going to allow this? The Government are elected by the people in part to ensure the safety of the people. Knowingly allowing such a hazardous development in this location would surely be a failure of the Government to protect the people.

Standards exist for allowable limits of crystalline silica dust. Compliance with these standards has not been addressed within the EIS document.

In summary, in consideration of this proposal, SSD6395, the Department of Planning and Environment including the Minister as well as all persons involved in the decision-making process, the Developer, and all State and Federal elected officials, have a **duty of care** to the residents of Bobs Farm. We must learn from the mistakes made from Asbestos, the dangers

of which were not known at the time of its introduction to the marketplace (at least not known to the general public or Government officials). The **hazards** of silica dust exposure **are** known.

As a **hazardous** material, I believe that further, **independently sourced**, specific studies should be provided by the Developer, including:

- Background monitoring of existing levels of silica dust at 1, 3, and 5km radius, in all directions to account for varying wind directions, from the proposed excavation site boundaries to establish a current background level.
- Background monitoring of existing levels of silica dust at 1,3, and 5km radius, in all directions to account for varying wind directions, from an existing operation to be able to establish a modelling profile of expected increases to pre-mining conditions specifically for silica dust levels for which a standard exists (see attached documents)
- Monitoring and analysis of existing silica dust contamination of water tanks, the only source of drinking water for the Bobs Farm area residents, at 1, 3, and 5km radius, prior to any approval to establish an accurate background level.

Note that Section 12.5.1 Ambient Particulate Monitoring within the EIS for SSD6395 has used figures obtained from 29km away from the site. Since the available data is from 2013 and additional Sand Mining operations have commenced in the surrounding areas to the proposed site, these figures are inadequate at best, and should be considered obsolete.

As a **hazardous** product, proposed compliance information should be provided by the developer by way of an amended EIS or SEARS that addresses all required information in relation to the definition of a **hazardous** or **offensive** industry. Amendments should include the specific silica dust monitoring for existing background levels specifically from the proposed operational site.

Furthermore, a requirement of transportation of this product, silica sand, under Workplace Health and Safety regulations requires SDS sheets be carried by the driver. The SDS for silica sand as per GHS SDS regulations effective from 2017 must contain, but is not limited to:

SIGNAL WORD: DANGER



Hazard Statement(s):

H350 May cause cancer.

H372 Causes damage to organs through prolonged or repeated exposure.

Safety Data Sheet

Acute toxicity: The toxicity of crystalline silica is directly proportional to the ability of any particle to reach the lower respiratory tract. Quartz particles with an aerodynamic diameter below 10um are likely to be most harmful to humans, as they reach the lower respiratory tract and are less readily removed by the lungs.

Increases in lung cancer have been attributed to the inhalation of crystalline silica in a number of industries, including: ore mining; quarrying and granite works; ceramics pottery, refractory brick and diatomaceous earth industries; and in foundry workers.

The International Agency for Research on Cancer has classified crystalline silica as a Group 1 Carcinogen - Carcinogenic to Humans, based on sufficient evidence in humans and animals.

Increasing in vitro and in vivo evidence suggests that lung carcinomas in rats are a result of marked and persistent inflammation and epithelial proliferation.

Crystalline silica also causes a range of non-neoplastic pulmonary effects, including: inflammation, silicosis, lymph node fibrosis, airways disease, emphysema and increased permeability of the airspace epithelium.

Chronic effects: Epidemiological studies in humans have revealed that crystalline silica may cause lung cancer, silicosis, lymph node fibrosis, airways disease, emphysema and lung inflammation.

12. ECOLOGICAL INFORMATION

Ecotoxicity

Avoid contaminating waterways.

Please note that we have attached a SDS as an example. (refer to Folder titled "EIS objection documents, Silicon Dioxide, Crystalline). It should also be noted that there are over 220 available SDS on the internet when searching silica, and numerous others when searching the chemical name SiO₂.

Silica is listed as #2 on Worksafe Australia's list of **hazardous chemicals**, with plans to reduce the number of cases of **fatal silicosis**. How is the reduction of silicosis going to be possible if the number of people exposed to silica dust is increased?

I would also like to state my alarm at the fact that one of the exposed groups within our community will be our children. The primary school is located at the proposed exit point to this operation. Even without the exit point, the proximity to the site of operations will see them exposed to silica dust. They are the most vulnerable of all as their lungs are still developing. The chances are that by the time they are in their 20's, they will be suffering silicosis alongside their parents. This is a fatal and debilitating disease! The only sure way to prevent this, is to remove the possibility of exposure from a known source.

I must reiterate that allowing this to even reach this stage is a failure of Government to protect the people and, that knowing the extreme danger of deadly silica dust, approval of this development in this location would see the failure of the Governments duty of care.

I believe that I have adequately highlighted the two main points that I wish to address in this objection, those being that readily available information about the dangers of silica dust within extractive industry is considered **hazardous**, and as such, the declaration by the applicant is incorrect.

Regards,

Robert Goldsworthy

Please find the following documents in an attached file:

- NSW Government Crystalline Silica Technical Information Sheet
- SDS Silicon Dioxide, Crystalline (1 of over 220 available, all of which we can provide if requested to do so.)
- HSIS Consolidated List of Dangerous Chemicals
- Safe Work Australia Workplace Exposure Standards for Airborne Contaminants (2018)
- Cancer Council Occupational Cancer Risk Series, Silica dust. Fact Sheet.