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Nicholas Hall - Planner  
Mining and Industry Projects  
Dept. of Planning and Infrastructure  
GPO Box 39  
SYDNEY 2001  
[Nicholas.Hall@planning.nsw.gov.au](mailto:Nicholas.Hall@planning.nsw.gov.au)

25 October 2012

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**

***INCITEC 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 falling 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.

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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,

[REDACTED]  
[REDACTED]  
[REDACTED]

## Nicholas Hall - Submission Details for [REDACTED]

To: <Nicholas.Hall@planning.nsw.gov.au>

Date: 9/20/2012 5:13 PM

CC: <assessments@planning.nsw.gov.au>

☒ Department of Planning

Confidentiality Requested: yes

Disclosable Political Donation: no

[REDACTED]

[REDACTED]

[REDACTED]

Content:

I believe residents in Stockton are entitled to the same environmental protections as every other Australian citizen. I find it incredulous that a fertilizer manufacturer would from the outset try to duck out of its environmental requirements even before they start as evidenced by the attempt to re zone Stockton as an industrial / residential transition zone.

Incitec I believe are setting up to compete with orica and as such will be competing on price. Therefore there will be every incentive for them to cut costs on order to get the business. This is a bad start and has significant potential for harm to my area, my kids and my life. This I wholeheartedly object to the incited development proposal. Incidentally I have no objection to orica's proposals which seem to be far more safety conscious and not so business profit driven to the exclusion of my safety.

Sincerely,

[REDACTED]

[REDACTED]

Submission for Job: #4986 Incitec Ammonium Nitrate Manufacturing Facility Project  
[https://majorprojects.affinitylive.com?action=view\\_job&id=4986](https://majorprojects.affinitylive.com?action=view_job&id=4986)

Site: #2546 Incitec, Kooragang Island  
[https://majorprojects.affinitylive.com?action=view\\_site&id=2546](https://majorprojects.affinitylive.com?action=view_site&id=2546)

[REDACTED]

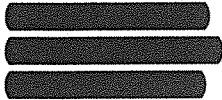
[REDACTED]

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



Monday, October 22

As a resident of Stockton please accept this submission of objection regarding Incitec Pivot's proposed ammonium nitrate plant on Kooragang Island (SSD-4986).

As a young mother who moved to Stockton to raise a family, I believe the proposal creates an unacceptable risk to nearby residents and Incitec's Environmental Impact Statement does not address my concerns of explosive risk, noise, air and water pollution and possible impacts to house values.

Newcastle and the suburbs that surround the Port are demanding responsible planning decisions and the mere thought of two ammonium nitrate plants, operating side-by-side just 800 from residents is a planning disaster.

The direct impacts from Incitec's proposal for me and my family include:

**Potential for explosion**

Incitec's EIS fails to adequately address my concern around 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 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 with 800 m of residents is not acceptable to the communities that surround the proposal.

### **Air Pollution**

As a mother of a young child and another on the way, I'm deeply concerned that Incitec's plant will only add to already deteriorating air quality. 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 among 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 does little to abate my concerns regarding air pollution.

### **Noise Pollution**

Industrial noise, especially night-time noise is already a major concern which impacts my family directly. Incitec's EIS noise monitoring of the site was conducted when Orica's ammonia plant was not even in operation and proved that Orica is not meeting acceptable noise levels.

Furthermore, Incitec in their EIS, argue 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 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 completely absurd.

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

### **Inadequate consultation**

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 unaware of the Project. Another example of poor consultation is residents that 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, Incitec has declared a two year delay in making any decision on the Project. This may please IPL's investors; however it prolongs resident uncertainty, stymies local investment and provides Incitec with an extended period to lobby Government ministers.

The amount of community consultation over a twelve month period does not match the enormity of the Projects and its impacts on residents.

### **Impacting house prices**

Incitec's EIS fails to address my concern that a second ammonium nitrate plant may impact 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 may decrease. Downward pressure on properties would be a direct result from fewer new families moving into areas like Stockton and a reputational stigma for suburbs closest 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.

### **Traffic Impacts**

Traffic is already a major problem as a result of industrial activity on Kooragang Island. Incitec's EIS does nothing to mitigate future traffic problems during construction and its operational phase.

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

### **Employment and economic impacts in Newcastle and Lower Hunter**

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 impacts the plant brings to tens of thousands of people, 60 jobs are not commensurate with the more obvious and insidious impacts the plant will bring.

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

### **Polluting the hunter river**

As a keen fisherman and swimmer, it's concerning that Incitec will be handed yet "another license to pollute" the Hunter River. If Incitec truly want 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 fisherman, not to mention that Kooragang is an international recognised RAMSAR wetland.

Excessive industrial development with a licenses to pollute the river close to a RAMSAR area is not common sense planning, nor does it position the Hunter River in a positive light to tourists.

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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,

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■■■■■■■■■■

#### Location

- relocating the plant to Tomago or in the Hunter Valley were not investigated enough as possible options. Can a comparison of the pro's and con's be completed for Tomago and the Hunter Valley?

#### Risk

- A risk assessment of plant operations needs to be detailed further for the effect of unlikely incidents, for both air quality and water discharge impacts on the environment and sensitive receivers. As pollution events occurred in 2007-2009, further pollution events are expected regardless of the control measures put in place due to the cumulative act effect.

#### Community

- The sample size is not tailored to the most affected residence, as minor day to day implications do not affect the Newcastle LGA.
- The report does not conclude their findings, Does the community want this development?
- I believe the attitude statements are biased.
- 58% of community respondents had concerns with the plant being installed, surely this is justification to reassess possible locations for the plant, perhaps closer to their customers, in a less densely populated location.

#### Traffic

- why not transport the materials, rather than transporting the product to the consumers?

#### Air Quality

- Report is still in draft form.
- the report does not detail worst case emergency scenarios nor the pollutants emitted during emergency events, what are the worst case impacts?
- The report does not focus on mean NO<sub>x</sub> impact to sensitive receiver's, rather than focusing on the maximum. I would like a clarification on the average discharge of NO<sub>x</sub> into the atmosphere as compared to the average background of NO<sub>x</sub> in the Stockton community, rather than the OEH criteria.
- provide justification for monitoring the scrubber and boiler yearly, and not monthly or fortnightly?


#### Water quality

- provide details of the water quality discharged compared to ANZECC criteria.
- will there be further accumulative effect of additional shipping movements caused by the increase in coal loaders in the future?

- struggling to find a suitable discharge point for the effluent is a strong indication of the pollution that the plant will be discharging is excessive, is it possible a failure in the modelling will result in the pollution floating and causing further impacts to recreational water activities, is it possible these will exceed ANZECC criteria?

- has the possibility of have nitrogen remove processes onsite been evaluated to be used onsite?

- what would be a typical response for a water pollution event through the proposed discharge points?



Oct 25, 2012

Nicholas Hall-Planner  
Mining and Industry Projects  
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.





Nicholas Hall - Submission Details for [REDACTED]

---

From: [REDACTED]  
To: <Nicholas.Hall@planning.nsw.gov.au>  
Date: 10/29/2012 12:33 PM  
Subject: [REDACTED]  
CC: <assessments@planning.nsw.gov.au>

---



Planning &  
Infrastructure

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Content:

1. The proposed plant should not be in the at risk perimeter of the 6th biggest city populous.
2. Urban lifestyle does not sustain and survive with the industrial cumulative impact of 21 thousand tonnes of ammonium nitrate and THE EPA could not handle the cumulative impact under the world standards of cumulative impact
3. the examples of explosion experienced across the world at other sites; shows such a development puts our population at risk of incident and death
4. inadequate port authority, NSW Government & big industry to improve port infrastructure. Neglect at this level will ensure Incitec will continue to contribute to Newcastle port inefficiency. There is no Port Plan, No transport, No rail, no adequate dust noise and water monitoring plan that offers strategy to affect old licenses and licences that are breached. higher pollution risks, deaths on roads and ships anchored off shore in a ques- result in INCITECS Proposal being unacceptable

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

Submission for Job: #4986 SSD-4986, Incitec Ammonium Nitrate Manufacturing Facility Project  
[https://majorprojects.affinitylive.com?action=view\\_job&id=4986](https://majorprojects.affinitylive.com?action=view_job&id=4986)

Site: #2546 Incitec, Kooragang Island  
[https://majorprojects.affinitylive.com?action=view\\_site&id=2546](https://majorprojects.affinitylive.com?action=view_site&id=2546)

[REDACTED]  
[REDACTED]

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**Brendan Liew - Submission against Incitec Pivot Kooragang plant proposal (proper submission)**

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**To:** <plan\_comment@planning.nsw.gov.au>  
**Date:** 10/25/2012 3:28 PM  
**Subject:** Submission against Incitec Pivot Kooragang plant proposal (proper submission)

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Sorry Mr Hall my other submission left a couple of things out. This is my proper submission.

Dear Sir,

I do NOT support this project (SSD-4986).

The reasons I object are

- Unacceptable risk – there will be two potentially explosive plants working side by side less than 1km away from residents.
- Pollution – both in the air & in the hunter river would increase.
- Inadequate community consultation – a lot of people in Stockton & nearby suburbs were not informed of this development which is quite insensitive especially to Stockton residents after the Orica incident.

In addition to the above I went to both the SCAG (Stockton Community Action Group) meeting & the following night info session by Incitec Pivot. I asked the personnel at the Incitec Pivot meeting "Can you guarantee that an explosion like that described by SCAG would never happen with this plant being proposed by Incitec Pivot on Kooragang?" I never got a definite "No" as an answer. I only got responses such as "It is a very small chance" or "Very unlikely". For me this is not good enough. There were plenty of diagrams at the Incitec info night but none showing a possible blast radius in the event of explosion. The Incitec spokespersons were very helpful in trying to give as much information as they could for mine there is too much risk to have this plant operating in the proposed location.

*IMPORTANT: I would prefer not to have my name available to the applicant or on the department website.*

Yours truly,



## Nicholas Hall - Submission Details for [REDACTED]

To: <Nicholas.Hall@planning.nsw.gov.au>

Date: 10/29/2012 7:44 PM

CC: <assessments@planning.nsw.gov.au>

☒ Department of Planning

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

Content:

[REDACTED]  
[REDACTED]  
[REDACTED]

Submission for Job: #4986 SSD-4986, Incitec Ammonium Nitrate Manufacturing Facility Project  
[https://majorprojects.affinitylive.com?action=view\\_job&id=4986](https://majorprojects.affinitylive.com?action=view_job&id=4986)

Site: #2546 Incitec, Kooragang Island  
[https://majorprojects.affinitylive.com?action=view\\_site&id=2546](https://majorprojects.affinitylive.com?action=view_site&id=2546)

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## Nicholas Hall - Submission Details for [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

☒ Department of Planning

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

### Content:

As a resident of Stockton please accept this submission of objection regarding Incitec Pivot's proposed ammonium nitrate plant on Kooragang Island (SSD-4986).

In my opinion the proposal creates an unacceptable risk to nearby residents and Incitec's Environmental Impact Statement does not address my concerns of explosive risk, noise, air and water pollution and possible impacts to house values.

Newcastle and the suburbs that surround the Port are demanding responsible planning decisions and the mere thought of two ammonium nitrate plants, operating side-by-side just 800 from residents is a planning disaster. The direct impacts from Incitec's proposal for me and my family include:

### Potential for explosion

Incitec's EIS fails to adequately address my concern around 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 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).

Ammonium Nitrate has brisance potential and secondary explosion potential and with the surrounding land uses to the proposed development including significant petroleum storage this type of risk is unacceptable.

It is understood that a draft Kooragang Island emergency Plan has been developed for review by an expert panel. This plan has no consideration for the evacuation or emergency management of Stockton because of the difficulty to evacuate the peninsula, therefore increasing the risk profile with such a development should not be allowed. It is noted that on New Year Eve every year it takes approximately 3 hours for the traffic to subside across Stockton at a time when everyone is trying to leave via the only transport route, during an emergency such a situation would be catastrophic.

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 with 800 m of residents is not acceptable to the communities that

surround the proposal.

#### Air Pollution

As young parent with two small children, I'm deeply concerned that Incitec's plant will only add to already deteriorating air quality. 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 does little to abate my concerns regarding air pollution.

#### Noise Pollution

Industrial noise, especially night-time noise is already a major concern which impacts me. Incitec's EIS noise monitoring of the site was conducted when Orica's ammonia plant was not even in operation and proved that Orica is not meeting acceptable noise levels.

Furthermore, Incitec in their EIS, argue 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 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 completely absurd.

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

#### Inadequate consultation

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Incitec's own 'community perception' survey conducted in April 2012, identified less than a third of residents were unaware of the Project. Another example of poor consultation is residents that 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, Incitec has declared a two year delay in making any decision on the Project. This may please IPL's investors; however it prolongs resident uncertainty, stymies local investment and provides Incitec with an extended period to lobby Government ministers.

#### Impacting house prices

Incitec's EIS fails to address my concern that a second ammonium nitrate plant may impact 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 may decrease. Downward pressure on properties would be a direct result from fewer new families moving into areas like Stockton and a reputational stigma for suburbs closest 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.

#### Traffic Impacts

Traffic is already a major problem as a result of industrial activity on Kooragang Island. Incitec's EIS does nothing to mitigate future traffic problems during construction and its operational phase.

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



nitrous oxides levels.

#### Employment and economic impacts in Newcastle and Lower Hunter

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 impacts the plant brings to tens of thousands of people, 60 jobs are not commensurate with the more obvious and insidious impacts the plant will bring.

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

#### Polluting the hunter river

As a keen fisherman and swimmer, it's concerning that Incitec will be handed yet "another license to pollute" the Hunter River. If Incitec truly want 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 fisherman, not to mention that Kooragang is an international recognised RAMSAR wetland.

Excessive industrial development with licenses to pollute the river close to a RAMSAR area is not common sense planning, nor does it position the Hunter River in a positive light to tourists.

[REDACTED]

Submission for Job: #4986 SSD-4986, Incitec Ammonium Nitrate Manufacturing Facility Project  
[https://majorprojects.affinitylive.com?action=view\\_job&id=4986](https://majorprojects.affinitylive.com?action=view_job&id=4986)

Site: #2546 Incitec, Kooragang Island  
[https://majorprojects.affinitylive.com?action=view\\_site&id=2546](https://majorprojects.affinitylive.com?action=view_site&id=2546)

[REDACTED]

[REDACTED]

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- 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.

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The potential consequences of the proposal upon my family include:

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***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.

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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

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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.

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***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.

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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.

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## **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.

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

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***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 falling 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.

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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,

[REDACTED]  
[REDACTED]  
[REDACTED]

Nicholas Hall - Submission Details for [REDACTED]

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[REDACTED]  
To: <Nicholas.Hall@planning.nsw.gov.au>

Date: 10/23/2012 2:41 PM

[REDACTED]  
CC: <assessments@planning.nsw.gov.au>

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☒ Department of Planning

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

[REDACTED]  
[REDACTED]  
[REDACTED]  
Content:

Although the risk of explosion is low I believe the location is too close to residential suburbs particularly Stockton where I reside with my family.

[REDACTED]  
Submission for Job: #4986 SSD-4986, Incitec Ammonium Nitrate Manufacturing Facility Project  
[https://majorprojects.affinitylive.com?action=view\\_job&id=4986](https://majorprojects.affinitylive.com?action=view_job&id=4986)

Site: #2546 Incitec, Kooragang Island  
[https://majorprojects.affinitylive.com?action=view\\_site&id=2546](https://majorprojects.affinitylive.com?action=view_site&id=2546)

[REDACTED]  
[REDACTED]  

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

29 October 2012

Dear Sir/Madam

As a resident of Stockton please accept this submission of objection regarding Incitec Pivot's proposed ammonium nitrate plant on Kooragang Island (SSD-4986).

In my opinion the proposal creates an unacceptable risk to nearby residents and Incitec's Environmental Impact Statement does not address my concerns of explosive risk, noise, air and water pollution and possible impacts to house values.

Newcastle and the suburbs that surround the Port are demanding responsible planning decisions and the mere thought of two ammonium nitrate plants, operating side-by-side just 800 from residents is a planning disaster.

The direct impacts from Incitec's proposal for me and my family include:

**Potential for explosion**

Incitec's EIS fails to adequately address my concern around 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 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 with 800 m of residents is not acceptable to the communities that surround the proposal.

### **Air Pollution**

I'm deeply concerned that Incitec's plant will only add to already deteriorating air quality. 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 does little to abate my concerns regarding air pollution.

### **Noise Pollution**

Industrial noise, especially night-time noise is already a major concern which impacts me. Incitec's EIS noise monitoring of the site was conducted when Orica's ammonia plant was not even in operation and proved that Orica is not meeting acceptable noise levels.

Furthermore, Incitec in their EIS, argue 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 completely absurd.

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

### **Inadequate consultation**

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 unaware of the Project. Another example of poor consultation is residents that 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, Incitec has declared a two year delay in making any decision on the Project. This may please IPL's investors; however it prolongs resident uncertainty, stymies local investment and provides Incitec with an extended period to lobby Government ministers.

### **Impacting house prices**

Incitec's EIS fails to address my concern that a second ammonium nitrate plant may impact 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 may decrease. Downward pressure on properties would be a direct result from fewer new families moving into areas like Stockton and a reputational stigma for suburbs closest 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.

### **Traffic Impacts**

Traffic is already a major problem as a result of industrial activity on Kooragang Island. Incitec's EIS does nothing to mitigate future traffic problems during construction and its operational phase.

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

### **Employment and economic impacts in Newcastle and Lower Hunter**

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 impacts the plant brings to tens of thousands of people, 60 jobs are not commensurate with the more obvious and insidious impacts the plant will bring.

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

### **Polluting the hunter river**

As a keen fisherman and swimmer, it's concerning that Incitec will be handed yet "another license to pollute" the Hunter River. If Incitec truly want 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 fisherman, not to mention that Kooragang is an international recognised RAMSAR wetland.

Excessive industrial development with a licenses to pollute the river close to a RAMSAR area is not common sense planning, nor does it position the Hunter River in a positive light to tourists.

---

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,

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Nicholas Hall - Submission Details for [REDACTED]

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[REDACTED]  
[REDACTED]  
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[REDACTED]  
[REDACTED]

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☒ Department of Planning

Confidentiality Requested: yes

Disclosable Political Donation: no

[REDACTED]  
[REDACTED]  
[REDACTED]

Content:  
UNACCEPTABLE RISK.

Based on the information I have to date:

Already we have large quantities of Ammonia Nitrate stored on a neighbouring site (Orica facility) which has the potential to kill and injure people within a 5km plus radius.

If this development was to be approved we are further adding to the risk of a large scale disaster.

The information I have is that these risks are real and there are examples of ammonia nitrate based disasters on record. Note, the quantities involved in historic disasters are nothing like the quantities being proposed to be stored on Kooragang Island.

There is no evidence that these risks can be managed to the extent they are acceptable.

[REDACTED]  
[REDACTED]  
[REDACTED]

Submission for Job: #4986 Incitec Ammonium Nitrate Manufacturing Facility Project  
[https://majorprojects.affinitylive.com?action=view\\_job&id=4986](https://majorprojects.affinitylive.com?action=view_job&id=4986)

Site: #2546 Incitec, Kooragang Island  
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[REDACTED]  
[REDACTED]

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