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Dear Sir/Madam

As a resident of Islington please accept my submission of objection regarding Incitec Pivot's proposed Ammonium Nitrate (AN) plant on Kooragang Island (SSD-4986). I am aware that the development proposal has been deferred for up to two (2) years but wish to make my objection known at this point in time.

In my opinion the proposal creates an unacceptable risk to nearby residents not only in Stockton but the greater Newcastle city area and Incitec's Environmental Impact Statement does not address many concerns that I have, including those of explosive risk, air, noise and water pollution to name but a few.

Newcastle and the suburbs that neighbour or border the Port are demanding responsible planning decisions and the mere thought of two ammonium nitrate plants, operating side-by-side just 800 metres from a populous residential suburb is a planning disaster.

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

Explosive Risk

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 the Orica and Incitec sites). 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 as recently as in the year 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 at Stockton in 2011.

One of the fundamental responsibilities of any Government is the welfare and protection of the people they serve and this proposal undermines the safety of

approximately 50,000 residents within a 5km radius of the proposed development site. Government should note that if Incitec proceeds at any point in time there will be enough explosive power on Kooragang Island to match the Hiroshima atomic bomb, a very scary thought. The atomic bomb dropped on 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 ammonium nitrate in Port Adelaide due to explosion risk for residents, which is outlined by a South Australian WorkCover report. Such a massive concentration of ammonium nitrate storage within 800 m of residents is not acceptable to the communities that surround the proposal.

Air Pollution

As a parent with two adult children, and hopefully grandchildren one day, I'm deeply concerned that Incitec's plant will only add to Newcastle's already deteriorating air quality. Stockton residents currently experience high levels of coal dust from Port Waratah Coal Services and Newcastle Coal Infrastructure Group, diesel particulates from all industry and nitrous oxides from Orica's plant.

Two large scale ammonium nitrate plants, operating side by side and in such close proximity to residential suburbs creates an especially high concentration of NOx gases that are proven detrimental to respiratory health, especially in the young and elderly.

Orica's expansion and Port Waratah Coal Services' T4 proposal, will further impact 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 not only Stockton residents but my family, even at Islington due to overnight coal train movements just 400 metres from my home and from road vehicle movements in our area.

Incitec's EIS noise monitoring of the site was conducted when Orica's ammonia plant was not even in operation and has helped prove 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" in certain circumstances. This is absolutely ludicrous and shows the contempt that Incitec hold for local communities in their role as responsible and respectful industrial neighbours.

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 friend of many residents who are personally affected by noise from Orica and Port Waratah Coal Services, 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 to be exempt from standards and regulations put in place to protect neighbouring residential suburbs?

Water Pollution - Polluting the Hunter River

As a recreational 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 discharge 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, wetland areas should be protected and industrial activity that has a potential to damage such an area should not be given the green light. This proposal also does not portray the Hunter River in a positive light to tourists and the tourism industry.

Inadequate Consultation

Many residents from Stockton, Carrington, Tighes Hill, Islington and Mayfield have been left in the dark on this project. Letter drops and only one information session two months after the Orica disaster have occurred to date and do not constitute 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 5km 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 to their cause and ideals for approval of the development.

Impacting House Prices

Incitec's EIS fails to address Stockton resident concerns that a second ammonium nitrate plant may impact house prices in their suburb. If Incitec's development is approved, the risk profile increases for all suburbs close to Kooragang and it's highly likely and expected 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 and accountable if property value reductions were a result of their Project.

Traffic Impacts

Traffic is already a major problem as a result of industrial activity on Kooragang Island. Incitec's EIS fails to address and 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 emitted into the air.

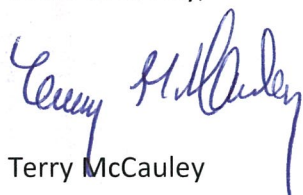
Employment and Economic Impacts in Newcastle and Lower Hunter

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, the creation of just 60 new jobs is 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 now be included in a new revised EIS that the Government should direct Incitec Pivot to undertake.

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,



Terry McCauley