

**From:** NIKO Leka <lekaniko@gmail.com>  
**To:** <Nicholas.Hall@planning.nsw.gov.au>  
**Date:** 10/6/2012 2:32 am  
**Subject:** Objection to Incitec Pivot proposed ammonium nitrate plant on Kooragang Island (SSD-4986)

Nicholas Hall – Planner  
Mining and Industry Projects  
Dept. of Planning and Infrastructure  
GPO Box 39  
SYDNEY 2001

3rd October, 2010.

Dear Mr Hall

I lodge this submission to object to Incitec Pivot's (IPL) proposed ammonium nitrate (AN) plant on Kooragang Island (SSD-4986). In addition I point out that IPL's Environmental Impact Statement (EIS) is littered with window dressing designed to convey a favourable impression, rather than facts.

The proposal involves storage of 12,500 tons of AN. Despite assurances of "best practice" there is the risk of an explosion. Such an explosion would result in widespread catastrophe across most suburbs of Newcastle. The loss of life would be huge. There is no reason to expose the population of Australia's largest rural city to such a risk.

To propose storing such a large amount next door to Orica's 9,000 tons of AN, more than doubles the risk.

IN 2001 300 tons of AN exploded in Toulouse, France, killing 33 people and injured thousands within a 5km radius. Yet according to the EIS, the blast zone does not extend beyond IPL's property boundaries. That is not credible.

Further information on blast contours is not supplied by either firm, citing security reasons for fear of terrorist attack. In that case, it may be concluded that both firms pose significant, even if undeclared, risk to Newcastle residents.

The safety record of both firms does not inspire confidence, and their responses have typically been to downplay them. For instance IPL's response to the Stockton Community Action Group's criticism of its poor safety record by citing an EPA notice of March 2012 was to assert that the "infringement related to the tracking of mud onto Heron Road" rather than firstly, acknowledge its occurrence, and secondly, explain to the public why the EPA regarded it as serious enough to warrant an infringement notice. There is no reason to advise of Orica's safety record and its cavalier attitude, as that is well known.

IPL's motives are driven by profit. For it to claim in its EIS that it is concerned with "ensuring thermal coal production is supported to maintain economic benefit to the local region and the State" reveals its contempt for residents, a continuation of its cavalier attitude demonstrated above.

I note that the South Australian government refused permission for a housing development near an IPL facility there that stores 200-300 tons of AM due to the risk of explosion, amongst other factors.

The EIS states that IPL intends to export some of its Technical Grade

AN (TGAN) to international markets, and Kooragang Island is ideally placed to allow it "sales flexibility". Since IPL explains that it is difficult to source large amounts from overseas suppliers, then it follows the export market must be a lucrative possibility. Yet there is no mention of just how much IPL intends to export.

It is inconceivable that with such a large investment- millions allegedly spent on scoping the project, that IPL did not have any idea about a downturn in demand for coal, and that it does not have any idea of how much it intends to export.

It's decision to shelve the project for two years citing a downturn in demand for coal, but yet to continue with its application shows that profit is its foremost motive, and it does not care about the anxiety and it causes to the community by proceeding with its application.

I am deeply suspicious of IPL's so-called shelving of the project, I do not think it is due to any downturn in local demand for coal production, especially as Newcastle Port is gearing up for a doubling of coal production with expansion at Kooragang Island as well as the T4 coal loader proposal. I think it is a stratagem on IPL's part to wear down community opposition.

If so, it is further evidence that community objections to the proposal are well founded.

IPL has suggested alternative locations- one at it's Hunter Valley facility, and the other at Tomago. It rules out the Hunter Valley location because of the necessity to truck large amounts of ammonia. However, it admits it is possible to pipe ammonia directly from ships to Tomago.

I recommend the proposal be rejected and IPL can consider safe alternatives.

I confirm I have not made a political donation totaling \$1000 or more in the past 2 years.

Yours Sincerely,

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