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25 October 2019

Director Transport Assessments
Planning and Services Division
Department of Planning, Industry and Environment
Application number – SSI 7666
GPO Box 39
Sydney NSW 2001

Dear Sir/Madam,

COFFS HARBOUR BYPASS ENVIRONMENTAL IMPACT STATEMENT

Chemistry Australia is the peak national body representing the chemistry industry in Australia. Chemistry Australia members include chemicals manufacturers, importers and distributors, logistics and supply chain partners, raw material suppliers, plastics fabricators and compounders, recyclers, and service providers to the sector and the chemistry and chemical engineering schools of a number of Australian universities.

Australia's entire society – businesses, consumers and governments – along with its natural environment receive enormous benefits associated with the safe, responsible and sustainable use of chemicals. To fulfil the optimal benefits of chemistry, balanced approaches are critical in stewarding effective chemical management, as supply chains are complex and can involve multiple partners through a products lifecycle.

Chemistry Australia welcomes the opportunity to provide comment on the Coffs Harbour Bypass Environmental Impact Statement. Chemistry Australia supports the development of new infrastructure projects to improve efficiency of transport networks, which underpin improved operating environments for businesses to continue to invest into Australia. The chemistry sector supplies chemicals into 104 of the 108 industry sectors, therefore it is important that any new projects have the ability to meet the demands of businesses to provide benefits to the whole economy.

There are three tunnels proposed with the Coffs Harbour bypass, however under current state of play, no vehicles carrying dangerous goods (placard load) are permitted through tunnels. Chemistry Australia strongly supports the project to be accommodating to a standard which allows all dangerous goods to be transported safely through tunnels to ensure the infrastructure project brings the greatest net benefit to all road users and to the economy of NSW.

Excluding such loads, not only can reduce the efficiency of our logistical network, but can shift increased risks elsewhere, such as, diverting loads through highly densely populated areas, sensitive land uses or sub-standard roads which are not accommodating for heavy vehicles. Dangerous goods need to be supported by balanced decision-making process, which considers efficiency and a holistic transport risk assessment to deliver optimal outcomes in terms of assessment. If you exclude dangerous goods transport from a major bypass, what is the consequential impact with the alternative route? Is the risk lower?

To support this above position, Austroads provides a standardised assessment method to mitigate the criticism of the transport of dangerous goods through tunnels and provide greater transparency of the

decisions reached. This report[1] provides a standardised methodology to guide the assessment of risk for the passage of Dangerous Goods through road tunnels in Australasia. By using a risk methodology, the document provides guidance for proponents of both old and new tunnels on whether the comparative societal benefits of using a road tunnel or an adjacent surface route is preferred when considering the total route traversed. The document also provides guidance on the application of design methodologies to reduce risk and consequence in a road tunnel.

Therefore, Chemistry Australia welcomes the new infrastructure project, however we consider that this new bypass needs to be accommodating for dangerous goods access, to support an efficient transport network and is the opportunity to deliver a lower risk network for dangerous goods transportation, from today.

For more information or if we can assist this review any further, please don't hesitate to contact me on +613 9611 5417 or by email at nzovko@chemistryaustralia.org.au

Yours sincerely,

Nick Zovko
Regulatory Policy Manager
Chemistry Australia

[1] Publication no. AP-R590-19; Dangerous Goods in Tunnels: Application and Methodology