

Dear Minister Sartor,

Over the past month the Botany Bay and Catchment Alliance has been approached by 2 developers seeking 'community consultation' with us. I have copied the most recent request which has come from GHD acting on behalf of Vopak.

It appears from the correspondence that the developers are being directed by the Department of Planning (DOP) to engage community groups in consultation as part of the Environmental Assessment Process.

BBACA cannot be party to this process.

We believe that such a process has serious flaws:

1. While the DOP is advising the developer to consult with community, the DOP is not providing the community with any capacity/resources to consult. This places highly impacted and poorly resourced communities, in particular, in an impossible situation.
2. If community groups do not participate it can be interpreted that the community at large is not interested in the development and its impacts. One only has to recall the case of Rouse Hill and the DOP's interpretation of community interest along the lines: 'we didn't realise that the people were interested in open space, we thought they were only concerned about the viewline...'
3. In some areas - usually the more affluent, better resourced and less impacted - the community may well wish to be consulted and use the opportunity to convince the developer to go elsewhere to a community that is by default of its demographic and existing impacts, 'more accommodating'.

The 2 developments I refer to here will both impact within the greater area of the Randwick/Botany Industrial Complex.

This complex is the largest and most significant industrial complex in NSW and to the greater degree is located within the Botany and Southern Randwick municipalities.

Organisations within the complex include Amcor, Orica, NSW State Government Corporation - Sydney Ports, Macquarie Airports leased - Sydney Airport, Qenos owned by Peoples Republic of China(PRC) state corporation ChemChina.

Over the past year the neighbourhood has seen the construction of the Groundwater Treatment Plant at the Orica site, the sale of Qenos to the PRC owned ChemChina, the approval for the expansion of Port Botany, the expansion of the Patrick Terminal, the approval for the upgrade of Amcor, the proposals to destroy HCB waste and repackage HCB waste at the Orica site. There are also proposals for a Building materials recycling plant at Banksmeadow, an additional 9 Bulk Containers at the P& O terminal, the expansion of Sydney Airport, the redevelopment of 20ha at Orica's

Southlands and now Energy Australia's Botany Bay Cable to Bunnerong Power Station and the proposed Biodiesel bulk storage at P&O terminal.

The last Port Botany Land Use Safety Study Report was produced in 1996. The Industrial Complex study was undertaken in 2000. There have been a number of developments which have increased the cumulative risk since that time and there are more to come. The previous studies were undertaken prior to 9/11 and Australia's engagement in Iraq. They were undertaken prior to Hurricane Katrina which has demanded a re-assessment of risk management as it relates to the location of critical infrastructure.

No-one is measuring the cumulative impacts and the social/economic/health inequities. For example, both Balmain and Botany have been regarded as industrial suburbs. Both are close to the Sydney CBD. Both are waterfront. Yet over the past 30 years Balmain has been progressively de-industrialised while during the same period Botany has been increasingly impacted (construction of port, 3rd runway, and allied industries). A quick comparison of the substances in the air (taken from the National Pollutant Inventory) shows the following:

Suburb	No Substances	Oxides of Nitrogen (kg per year)	Particulate Matter(kg per year)
Botany	60	1,300,000	76,000
Balmain	26	120,000	14,000

At no point has there been a coordinated plan to deliver this outcome it has happened in an uncoordinated, albeit chaotic, fashion.

This should not continue. Not only are the lives of local residents and workers at stake but this uncoordinated approach has resulted in congestion levels and higher risks which threaten the State's economy.

In the DUAP: *Botany/Randwick Industrial Report*, published 2001, page 21, the following recommendation is made:

Community awareness and consultation:

i. There is a high degree of community concern over the level of public risk associated with the operations of the Botany/Randwick industrial area. There is a need to strengthen on-going community participation, liaison and communication associated with the implementation of community-right-to-know principles.

*ii. While some industrial developments in the Botany/Randwick complex have established community consultation mechanisms, there is generally a lack of interaction between industry and the public. There is a need for the establishment of more formalised Community Consultative Committees, through which industry can keep the local community informed regarding issues that may affect the public, and the community can voice any concerns it may have related to the impacts of the particular development. **In some***

cases, it may be appropriate for a Community Consultative Committee to represent a group of related sites, rather than a single development.

Before we can begin to engage in consultation on new developments in this area we need the DOP to coordinate a Port/Airport/Industrial Complex Safety/Hazard/Security Review with particular emphasis on assessment of cumulative impacts. No such study has previously been undertaken. There are at least 5 reasons for undertaking this:

- i in recognition of the critical economic importance of the area
- ii assessing health and safety risks for residents
- iii assessing health and safety risks for workers
- iv raising awareness within the community with regard to compliance
- v raising awareness and promoting Corporate Responsibility

Such a review requires robust Community Consultation at the initial stage before the parameters have been framed.

There is already a wealth of material held by the Department of Planning. In May 2004 the Towards a Strategy for Botany Bay was placed on exhibition for comment. Some material that fed into that document has not been made available to the public and the final Botany Bay Strategy has not been made available even though in the press release

<http://www.planning.nsw.gov.au/plansforaction/pdf/botanybaymediarelease.pdf>
the then Minister indicated that the strategy would be finalised in 2004.

In summary, Minister, BBACA cannot participate in a process that effectively delivers 'death by a thousand cuts' to the northern Botany Bay communities. A Strategy was promised. A Strategy which provides certainty, equity and sustainable environmental outcomes is required. This is critical for both Industry and Community. There is a limit to the impacts that can be inflicted on one area and we need to address what those limits are - NOW - not after we have experienced a disaster.

Lynda Newnam
Botany Bay and Catchment Alliance
chairperson@botanybay.info
www.botanybay.info

PROTECTING ENVIRONMENT= PROTECTING PEOPLE