



CLARENCE ENVIRONMENT CENTRE Inc

29-31 Skinner Street

South Grafton 2460

Phone/ Fax: 02 6643 1863

Web site: www.cec.org.au

E-mail: admin@cec.org.au

Date: 20th October, 2018

To the Office of Environment and Heritage
npws.richmondriver@environment.nsw.gov.au

SUBMISSION to the proposed Bundjalung National Park ordnance removal

Introduction

The Clarence Environment Centre (CEC) has maintained a shop-front in Grafton for close to 30 years, and has a proud history of environmental advocacy. The conservation of Australia's natural environment, both terrestrial and and marine, has always been a priority for our members, and we believe the maintenance of healthy ecosystems and biodiversity is of paramount importance.

As such, we are pleased to learn that a long overdue clean-up of Department of Defence (DoD) garbage is being proposed. However we doubt too many people will be happy that taxpayers are now being asked to pay for rubbish dumping that should have been considered illegal in the first instance.

General comment

A question that arises at the outset is, why was the decision made that, *“the proposed activity would be undertaken mostly **outside** the existing POs (DoD's “permissive occupancy” area) and within Bundjalung National Park”*.

We are told that defence activities at the Evans Head air weapons range, *“are carried out in accordance with gazetted Defence Practice Areas and Permissive Occupancy agreements between Defence and NPWS.”*, and that: *“The boundary of EVDRAWR is subject to ongoing negotiation between Defence and NPWS to resolve historical uncertainties”*.

Given the residential and tourism development that has occurred over many decades since the DoD base was established, we believe that the Evans Head area is now totally unsuitable for any use by DoD, particularly the storage of unexploded materials, as apparently proposed.

Therefore we recommend that the OEH make serious approaches through its “ongoing negotiations”, with the aim of removing all DoD waste, and their continued activities in the area.

We also note that the clean-up, a process that involves incineration, is to take place over the Spring-Summer period, September 2018 – February 2019, i.e. during the highest fire danger period, in an area of high fire risk. However, we are told that: *“At the end of the public exhibition period in November 2018, NPWS will comprehensively review all submissions, prepare a submissions report and request further information if necessary from the Department of Defence”*. This means, if the September 2018 to February 2019 time frame is to be maintained, the work will be carried out at the very height of the fire danger season.

To compound that risk the proponent plans to site the incinerator on cleared land which is traditionally used by fire-fighting helicopters. This is illogical.

One justification for the proposed use of Bundjalung National Park for this incineration option is that: *“Offsite processing was discounted due to the hazards that may be posed by transport of potential UXO (unexploded ordinance) and EOW on public roads”*.

While the transport of explosive materials on public roads is hazardous, we point out that it happens all the time. Even the Roads and Maritime Services have been using explosives in their Pacific Highway upgrade work. At the same time, we do not believe that the indefinite storing of explosive materials at the site is acceptable. Therefore, in our opinion, this is not a legitimate argument for on-site incineration.

We point out that much of the waste, such as recyclables, chemicals, etc are already proposed to be taken off-site for disposal at licensed facilities. Therefore, we assert that, if the OEH can successfully negotiate the closing down of the DoD facility, all waste could be sorted in-situ, and disposed of through those “licensed facilities”, including unexploded ordinance material. A win – win situation one would think.

We appreciate the opportunity to comment.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'John Edwards', with a horizontal line extending to the right.

John Edwards
Honorary Secretary