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The Department of Planning and Infrastructure
GPO Box 39, SYDNEY NSW 2001
Attention: Rebecca Sommer
Rebecca.Sommer@planning.nsw.gov.au

22 November 2013

Dear Ms Sommer,

Submission: T4 Project RTS and PPR (PWCS) - Application No 10_0215

I strongly objects to this project on the basis that the community health, environmental, and socioeconomic impacts will far outweigh any short-term benefits the project claims it will deliver.

I formally request the opportunity to present to the Planning Assessment Commission when it is called.

There are two supporting documents accompanying this submission. They are:

- Appendix A. Economic Analysis by Rod Campbell (TAI)
- Appendix B. Table of objections and failings of the PPR

I have read the Department's privacy statement and give consent for our details to be published. I have not given any reportable political donations.



Fee Mozeley



The Project Report states that PM₁₀ concentrations will increase by up to 17.9 micrograms per cubic metre during construction and operation. International research has shown that every increase of 10 µg/m³ increases health impacts by 1-3% throughout the exposed community.

The New South Wales Government must act urgently to improve air quality in the Hunter. A responsible first step would be to postpone the assessment of the proposed fourth coal terminal until particle pollution in Newcastle is reduced to below the standards set to protect human health.

The NSW Government recently invested half a million dollars in the Lower Hunter Particle Characterisation Study to assess the levels and sources of PM₁₀ pollution. I urge Newcastle MP Tim Owen, Premier O'Farrell and the NSW Government to wait for the results of this study before assessing a massive development that will significantly worsen pollution.

Annual average PM₁₀ concentrations exceeded the World Health Organisation standard in seven of the last ten years at monitoring sites in Newcastle. The new monitoring station in Stockton regularly records exceedances of the national standard for 24 hour average PM₁₀ concentrations.

Local residents and community groups funded and conducted two air pollution monitoring studies during 2013. The first identified PM₁₀ levels up to 50% higher than the national standard at several suburban houses in suburbs close to coal stockpiles and train lines. The second confirmed that particle concentrations increase by up to 1200% as coal trains pass, with unloaded coal trains causing the highest levels of pollution. These studies were the first of their kind in Australia and are now being replicated by concerned residents in the coal-affected communities of Mackay, Brisbane and South East Queensland.

Particle pollution levels in Newcastle already exceeded the standard set by the World Health Organisation last years. The additional pollution caused by a fourth coal terminal would increase particle concentrations in urban Newcastle where community members are already exposed to harmful pollution levels.

The NSW Government must conduct a thorough Health Impact Assessment for the proposed coal terminal to assess the risk of hospitalisation, symptoms, disease and death among local residents exposed to current coal loader operations and the additional attributable impact of T4. This is especially important for the more than 32,000 Novocastrians who live within 500 metres of the coal corridor and the thousands living in the shadow of the three existing uncovered stockpiles.

The air quality modeling for T4 is based on pollution levels during 2010. Modelling based on just one year when pollution levels were at their lowest point during the last decade presents a misleading impression. The modelling should be repeated based on 10 years' data.

The economic case for T4 has unraveled. PWCS has based their predictions of jobs and revenue created by T4 on a type of economic modeling that has been widely rejected as biased and inappropriate for developments of this nature. The initial 120 million tonne per annum coal terminal wasn't expected to create any new jobs, yet PWCS says the smaller 70 Mtpa terminal will create 80 jobs. This doesn't stack up according to Australia Institute Economist Rod Campbell (see below).

Urgent government action is needed

- The proposed fourth terminal would increase the volume of coal exported by approximately 50%, along with the number of coal trains and the size of stockpiles in and near urban areas. The Premier should put the proposal on hold until the coal wagons are washed and covered.
- Premier Barry O'Farrell should instruct the coal industry to cover and wash coal wagons. This is consistent with the recommendations of a Senate Inquiry report that was released earlier this year.
- More than 4,000 people have written to the Premier, Planning Minister and Member for Newcastle to express their opposition to the 4th coal terminal. The NSW government has a statutory obligation to protect communities from public health risks.

Appendix B.

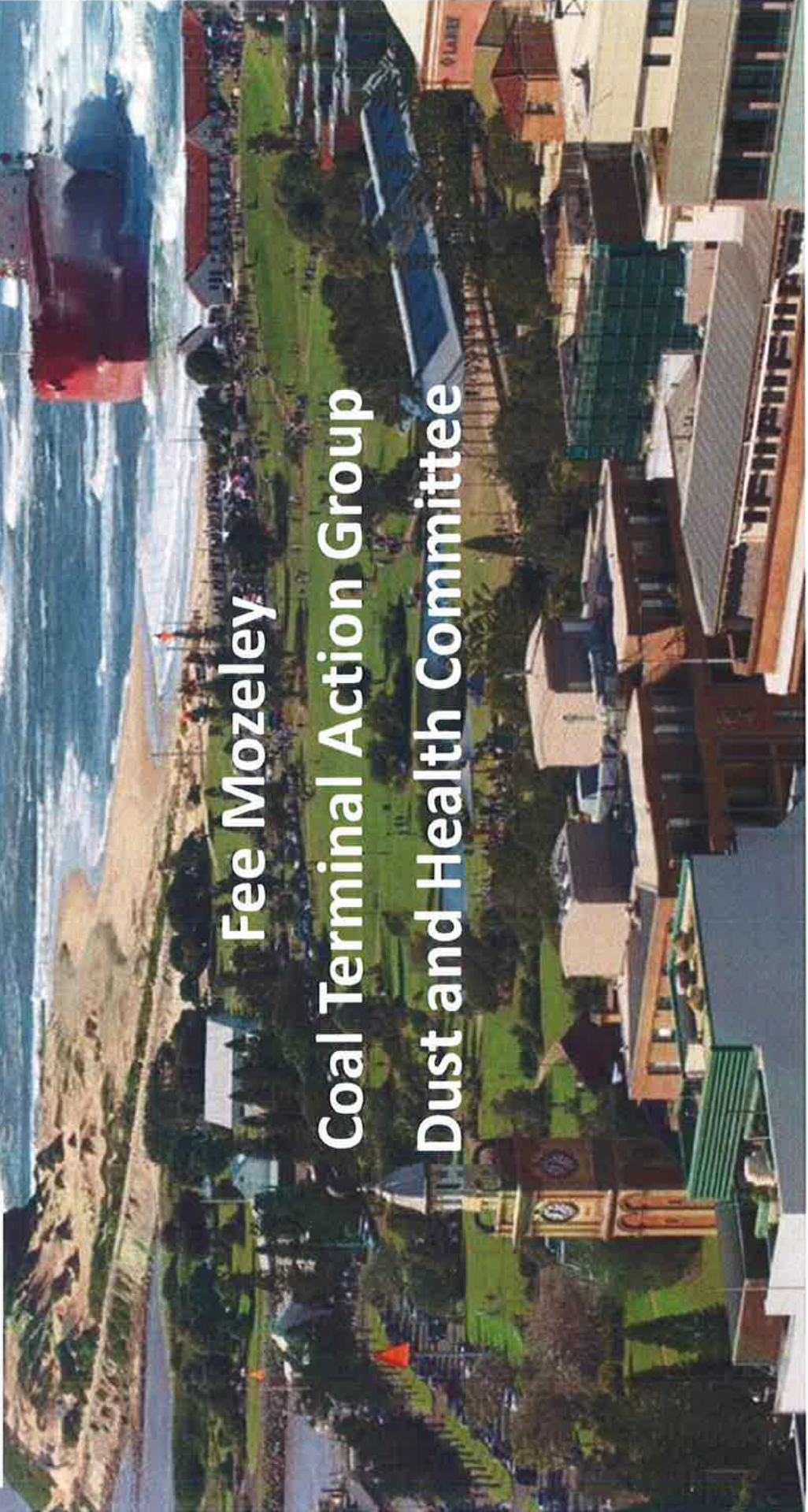
PPR Section	Topic	Issue	Recommendation
3.1	Overview of Modified Project	Conflicting statements regarding the capacity of the T4 project	The proposal varies throughout the document between a proposal for 70Mtpa nominal capacity, and 120Mtpa nominal capacity. For example, "site layout has been designed to accommodate future expansion ... to achieve 120Mtpa". All impacts of the project should be assessed at this capacity if this is the intended export volume, including biodiversity, GHG emissions, particulate pollution, train and traffic movements. The PPR should be revised to reflect the intended future volume.
3.2	Timing and staging	Insufficient information provided regarding annual nominations and projected coal throughput	There is insufficient information provided to determine the extent of the capacity shortfall and the changes in forecast of the export volumes. This is critical information that directly addresses the issues around justification. On provided information, the project is not adequately justified. Information about the current and anticipated nominations must be provided.
		Adequacy of future projections	It is not clear on what basis the claims for future increased demand are being asserted. Is this due to the "overall trend"? If this trend is reliable, why wasn't the reduction in coal chain export forecasts foreseen. More information required to justify the assertion of continued expanding demand. On provided information, the project is not adequately justified. Information used to estimate future demand must be provided.
3.3	Land reclamation and ground improvements	Dredge material, fill volumes, containment cells	All of these designs are conceptual, and are insufficiently developed to be capable of adequate assessment. Contamination from previous activity at the site was a critical issue raised in the submissions on the EA. The PPR must be revised to include detailed design of contamination management strategies to facilitate assessment.

PPR Section	Topic	Issue	Recommendation
5.1.2	Alteration to existing flood regimes	Channel construction and mitigation measures underspecified. Site surface water management plan does not specify trigger values or treatment of overflow.	More detailed design specifications are required to determine the extent to which these conceptual models are feasible, and deliver the requirements of the existing tidal flow regime. Similarly, precise detail on the site surface water management plan has not been adequately provided, particularly in relation to water quality trigger values and the treatment of discharges that exceed the predicted capacity. The current description of measures for surface water management is insufficient to adequately assess impact. The PPR must be revised to include detailed designs for surface water management and channel construction activities.
6.1.4	Biodiversity offset strategy	Insufficient evidence to demonstrate the feasibility of biodiversity offset strategy	The viability of the offset strategy must be demonstrated, shown to be an adequate substitute for proposed habitat removal, and supplemented by a permanent and funded adaptive management framework to ensure its effectiveness for the life of the project prior to any further consideration of the T4 proposal. The PPR must be revised to include more evidence of the feasibility of the biodiversity offset strategy.
6.1.2	Threatened species populations	Existing decline of migratory shorebirds	Further research must be undertaken to ascertain the cause of the rate of decline of migratory bird species in the Hunter Estuary prior to the approval of any development in the area with the potential to exacerbate the current accelerated decline.
7	Noise and vibration impacts	No assessment on the impact of noise and vibration on fauna in the adjacent National Park	There is no assessment of the impact of noise exceedences on biodiversity in the National Park adjacent to the project site. Is there evidence to show that this will have no impact on surrounding fauna, and particularly no impact on the effectiveness of the proposed biodiversity management and offset strategy? Please investigate this.

PPR Section	Topic	Issue	Recommendation
	Adequacy of proposed measures	Enclosure of stockpiles	Insufficient explanation is provided for why enclosed stockpiles are not considered feasible for the project. Greater explanation is required on this point. The PPR should be revised to explain why the enclosure of stockpiles is considered unviable.
9	Greenhouse Gas Emissions	Impacts of Scope 3 emissions to be assessed	Given the globally significant Scope 3 emissions from this project, the impacts of these emissions must be considered for the purposes of assessment, including their climate, environmental and human health impacts. Assessment of Scope 3 emissions are consistent with the DGR requirements for 'direct, indirect and cumulative impacts' of the project. The scale of these emissions are sufficient to reject the proposal.
		Scope 3 emissions inadequately mitigated	There are no proposed management or mitigation strategies submitted in the PPR to offset the full suite of GHG emissions from this project. The proponent must supply some evidence that all reasonable steps to mitigate these impacts has been made.



**PWCS T4 – COAL DUST
MITIGATION & MINIMISATION
FAILING OUR COMMUNITIES**



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Coal Terminal Action Group

Dust and Health Committee

World's Largest Coal Export Port

- Currently more coal through our suburbs than any other place in the world
- Scale of uncontained coal is unacceptable by global standards
- Too close to residential areas
- Current mitigation measures fail to protect communities
- Proposed mitigation measures will also fail

