



p.1

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Dept of Planning GPO Box 39 SYDNEY

FAO Rebecca Newman

Application reference 10-0215 - Objection

Port Stephens Greens wish to object to the proposed development by Port Waratah Coal Services of a fourth coal loading facility (T4) on Kooragang Island in the Hunter River. We submit that the application should be refused on multiple grounds, as set out below.

The environmental impact of the proposed additional coal loading capacity extends far beyond the specific site. A proper assessment of the impact needs to take account of the cumulative effect of increased coal mining and exports throughout the entire Hunter Valley 'coal chain' – from the mines themselves, through the transport corridors to the site of the loader, and ultimately the burning of the coal in export markets.

Health impacts

- A fourth coal terminal project would see many more coal trains passing through the Hunter Valley, including Maitland and Newcastle every day, increasing dust related health problems such as asthma and other respiratory ailments. The precise extent of these problems is not known due to inadequate monitoring, but there is already sufficient evidence to cause alarm. It is scandalous that coal wagons are not currently required to be covered to mitigate any adverse effects. The applicant's Environmental Assessment only considers the effect of dust within 20 metres of rail lines, when it is clear that the effects spread much further.
- The proposal also carries the risk of mobilising toxic contaminants on Kooragang Island, on the former BHP Steelworks site, and in the South Arm of the Hunter River (where dredging is proposed outside the terms of the current licence). Too little is known about the risks to ensure the communities of Newcastle will be protected from toxic accidents, seepage and accidents. There is no plan to fully remediate the sites.

Threat to Food and Water Security

 A Fourth Coal Terminal would facilitate many more large coal mines in the Hunter Valley and Liverpool Plains which threaten food and water security by destroying prime agricultural land, irreversibly damaging ground water systems and polluting waterways.

Other Ecological impacts

- This project would damage internationally important wetlands that provide critical habitat
 for protected migratory bird species and nationally threatened species including the Green
 and Golden Bell Frog and the Australasian Bittern.
- An area within the site is currently owned by the National Parks service, and provides irreplaceable habitat for migratory shore birds. The proposal will mean loss of habitat and

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- disruption to an ecologically significant proportion of a population of four migratory shorebird species listed under international conservation conventions.
- At least 11 species of migratory birds recognised by international treaties rely on the habitat at "Deep Pond" and its proximity to the Hunter estuary Ramsar site. Most of Deep Pond, the only freshwater refuge in the Hunter estuary, would be lost to this project.
- The applicant's Environmental Assessment fails to meet the requirements set out by both the State and Federal agencies in relation to these impacts.
- Propose 'offsets' are an unacceptable response to adverse ecological impacts.

Contribution to dangerous climate change

- The coal exported through a fourth terminal would feed many large power stations around the world emitting millions of tons of carbon pollution each year, making a significant contribution to climate changes which the overwhelming body of scientific opinion sees as posing unacceptable risks.
- This project would damage internationally important wetlands that provide critical habitat for protected migratory bird species and nationally threatened species including the Green and Golden Bell Frog and the Australasian Bittern.
- An area within the site is currently owned by the National Parks service, and provides irreplaceable habitat for migratory shore birds. The proposal will mean loss of habitat and disruption to an ecologically significant proportion of a population of four migratory shorebird species listed under international conservation conventions.
- At least 11 species of migratory birds recognised by international treaties rely on the habitat at "Deep Pond" and its proximity to the Hunter estuary Ramsar site. Most of Deep Pond, the only freshwater refuge in the Hunter estuary, would be lost to this project.
- The Environmental Assessment fails to meet the requirements set out by both the State and Federal agencies, and the proposal represents an unacceptable risk to the Australasian Bittern.
- After construction, the coal terminal will provide no additional employment. Rather, it is likely to result in the loss of other economic activities in the port, such as tourism, fishing and other shipping

Limited employment benefit

• A fourth loader will provide no net increase in employment in the long term, after the construction phase. There is every possibility that adverse impacts on tourism, recreation and fishing industries in the Newcastle area will result in a net loss of jobs, and the encouragement that a fourth loader will give to the coal mining industry will only strengthen the adverse social and economic effects of the 'two speed' economy.

Contact for this submission

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