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This is a submission opposing the Port Waratah Coal Services Terminal 4 (T4) Development in Newcastle (10_0215).

Global Responsibility

In the 'Submission Overview for Abbot Point Coal Terminal Stage 3 Expansion,' the Ports Corporation of Queensland stated:
"Greenhouse emissions from the coal sent off-shore may be offset by consumers or producers of the energy. No government policy currently suggests that transport and handling providers must offset emissions which they do not make themselves".

If the T4 is approved, preparing Australia's coal for export to be burned in Asia –enough to fuel more than 15 large power stations - means that Australia will be responsible for some 288 million tones of carbon pollution released to the atmosphere.
450 million tonnes of Australian coal will be exported annually by 2015
200 million tonnes of this will be exported through Newcastle Harbour by 2015

The government cannot assume that greenhouse emissions from the coal sent offshore would be offset by the producers of the energy and by their consumers.
"At the International Energy Agency's 2011 World Energy Outlook…it said that if the world wants an even chance of having a stable climate, by limiting global warming to around 2°C, and total emissions to 450 parts per million, then it had better act fast, because its carbon budget was running out quickly."
[Giles Parkinson: Renew Economy 'Have our coal miners never heard of climate risk?' 8/3/2012]

The Government needs to:
1) Actively encourage rapid renewable energy development and conservation and
2) Utilize policies such as implementation of renewable portfolio standards and removal of subsidies for fossil fuels.

In a 2011 report, "Mining Coal, Mounting Costs: the Life Cycle Consequences of Coal," associate director of the Center for Health and the Global Environment at Harvard Medical School, Dr. Paul Epstein and his colleagues, stated that "accounting for the full costs of coal" would double or triple its price"
[Dr. P. Epstein (et al) ANNALS OF THE NEW YORK ACADEMY OF SCIENCES Issue: Ecological Economics Reviews]

Health Impacts - the Real Cost to the Nation

The Coal Mine Health & Safety Act Regulation 2006 defines airborne dust to include both respirable dust and inhalable dust (known as airborne particulates)

Respirable dust as defined in legislation is that fraction less than 10 microns, and is considered hazardous particularly when less than 4 microns as it can be deposited into the gas exchange regions of the lungs. It has a sub-division called “thoracic”, being the particle range 4 to10 microns, which is stated to be hazardous when deposited in the lung airways. Visible dust is normally considered to be larger that 100 microns in size.

Coal dust effects on health

1) PM2.5 concentration in ambient air increases the probability of hospital admissions for potentially fatal cardiac rhythm disturbances (heart attacks, ischemic heart diseases, disturbances of heart rhythm, and congestive heart failure)

2) Nitrogen oxides and PM2.5 irritate the lungs and makes people with asthma more susceptible to lung infections and reactions to pollens and exercise, and are also linked to stunted lung development (children are particularly susceptible). Fine particles can also have a negative impact on the blood.

3) PM10 is linked to hospital admission for ischemic stroke, which accounts for eighty-seven percent of all strokes. Coal dust triggers asthma attacks, and children are particularly susceptible.

4) Heavy Metals. There are a wide range of health problems associated with exposure to heavy metals such as lead, selenium, and mercury that may be present in coal dust. Depending on the chemical composition of the coal, coal dust may be carcinogenic. There is evidence linking coal dust to lymphomas in laboratory animals

5) In Bulga NSW the farming community found that their livestock (dairy cattle and horses) have a substantially increased rate of eye cancers. Local vets have linked this to the high levels of coal dust in the town.

6) Degradation and soiling of buildings can effect human health (coal dust particulates)

7) Ecosystem loss and degradation, with negative effects on quality of life and well-being.

8) A study of West Virginians (US) showed that people in high coal-producing counties had higher rates of health problems through dust inhalation (cardiopulmonary disease, chronic obstructive pulmonary disease (COPD), high blood pressure, lung disease, asthma and kidney disease)

9) The economic cost to Australia for coal related illness totals $2.6 billion.

According to the assessment "The T4 project is not expected to result in any criterion exceedences on any additional days of the year" [Vol 1 Air Quality]

Several Newcastle public health officials have said air quality modeling done for the T4 proposal made unsafe assumptions.

Dr. Peter Lewis, The Northern Sydney Central Coast area director for public health, stated "Any increased exposure to particulate pollution is associated with increased adverse health outcomes, even if the levels are below the current guidelines."
Furthermore, Dr. Lewis states that increased particulate exposure could cause deaths, require hospital admission, and make children have more chest colds, night-time coughs and trips to the doctor.[Damon Cronshaw: The Newcastle Herald on 30 October 2010]

Air quality modelling for the T4 is inadequate. The air quality modelling was based on very little data from Stockton. This suburb is already significantly affected by coal dust from the existing stockpiles. There are no PM2.5 and PM10 continuous monitors at Stockton, only samplers that take samples every 6 days, missing many events of high dust emissions. These samplers are located at inappropriate locations where impacts from buildings and trees are evident. Strong W and NW winds (prevalent during winter months) mean that a lot of coal dust is dispersed over Stockton. Analysis from samples taken by PWCS from complainants show that this dust is typically up to 20 % coal dust.

Hunter Valley Coal Chain export Volumes

The Hunter Valley Coal Chain Coordinator (HVCCC) declared capacity for 2011, which represents the capacity of the chain as an integrated operation, is 125.1 million tonnes per annum (mtpa). Compare this with the-

<u>'Prospective Increased Volumes'</u>:
a) Contractual nominations by producers: This is projected to increase to around 163 mtpa in 2012, 190 mtpa in 2013 209 mtpa in 2014 and 216 in 2015 before stabilising at this level.
b) Mines that are in the initial stages of planning: 1 mtpa in 2013, 7.5 mtpa in 2014, 10.5 mtpa in 2015, 30 mtpa in 2016, 36 mtpa in 2017 and then stabilising at 46 mtpa from 2018.

<u>Total of the Predicted Coal Volumes</u>
2012 163 mtpa (million tonnes per annum)
2013 191 mpta
2014 215.5 mtpa
2015 245 mtpa
2016 246 mtpa
2017 252 mtpa
2018 262 mtpa

Coal Stockpiles

Handling of stockpiles can release considerable quantities of airborne dust containing small particles of coal. Within this cloud there will be a proportion of particles which:-

1) have dimensions of 20 μm or less, referred to as Total Suspended Particulate (TSP).
2) within the TSP fraction of total airborne dust will be a proportion of particles which are of respirable size. -taken to be 10 μm or less, known as PM10
3) further, this respirable fraction includes a proportion of particles less than 2.5 μm in diameter (or PM2.5). While all sub-PM10 particles are considered respirable, those less than 2.5 m in diameter are likely to penetrate further into the lung and pose a serious health risk.

Hunter Valley and Newcastle Coals are considered to be generally harder and drier than in other regions, resulting in higher inhalable dust levels. According to an article in the mining publication 'International Longwall News', this is of great concern to health specialists, "It's a problem" stated a CFMEU representative.

However, the Australian Rail and Track Corporation (ARTC) hold a different opinion. Mr. Fullerton, representing the ARTC, told Senator Williams that Hunter Valley coal is "quite moist" compared to harder Queensland coal and **is not watered** when loaded onto the rail wagons.[Rural Affairs and Transport Legislation Committee 18/10/2010]

Dust Suppression

It is critical to reduce dispersion of coal particles:

1) Wind fences need to be used, not only at new 'proposed' site but constructed around the existing sites. If Port Waratah Coal Services (PWCS) and the government regulators are serious about addressing public health concerns relating to dust emissions, then wind fences would be built around existing stockpiles before embarking on projects like the T4. Wind fences are used all over the world.
2) Spraying/treating coal with a chemical agglomerate to bind the fine particles together to prevent dust emission.
3) Will Passive Dust Collectors be used to test effectiveness of any topical treatments and to determine if they substantially reduce coal dust emissions?
4) Water spraying reduces dust *but results* in acid runoff due to the leaching of heavy metals such as lead, selenium, and mercury that may be contained in the coal. How will this be addressed? Spraying needs to be consistent and all stockpiles watered *simultaneously*. How often will each stockpile be sprayed and for how long? What happens to the contaminated water?
5) The runoff is usually collected into a settling pond where the silt and coal dust settles to the bottom and is periodically removed. How is the coal sludge and silt disposed of? It is logical to presume that the silt would accumulate concentrated levels of heavy metals and should not be used as fill at T4 site as seepage of leachate will contaminate aquifers.
4) Bore water fed by aquifers is used by residents to water garden vegetable produce. Children play and cool off under bore water sprinklers in summer. What assurance has the community got that there will be no toxic contamination of bore water resulting from activities associated with T4?

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Health Hazards of Transporting Coal. Living and working along transportation corridors exposes the population to a vast range of health problems (discussed in this submission) from air-borne coal dust

Rail Transport

The Australian Rail Track Corporation (ARTC) received a $1.2 billion stimulus package to invest in rail infrastructure. Some $700 million has been invested in rail infrastructure capacity. This includes triplication of track, crossing loops and other upgrades. In 2011 the federal government revealed it would give the ARTC another $1 billion to build new coal rail lines from the Hunter mines to Newcastle Harbour.

Rail infrastructure for coal is heavily subsidised by the government. And yet both passenger and freight rail services suffer through a lack of sufficient funding. Some of these funds could have been allocated to build new rail for the commuting public to help ease traffic congestion on our roads.

Rail noise of 60 decibels at night would extend from 320 metres from the tracks to 370 metres. Compare this to a European standard of 40 decibels. Considering the frequency of train movements (1 every 27mins) 60 decibels is unacceptable.

Coal dust particles. Trains transporting coal release tons of respirable coal dust particles (PM2.5 and PM10) containing toxic heavy metal pollutants and nitrogen oxide (NOx).

Sources of Fugitive dust Emissions

Given the total tonnage of coal transported, the potential for dust emissions to escape from wagons and the rail corridor is enormous. Key contributing factors are:

- Coal leakage from doors of loaded wagons. 6%
- Wind erosion of spilled coal in corridor. 9%
- Parasitic load on sills, shear plates and bogies of wagons. 4%
- Residual coal in unloaded wagons and leakage of residual coal from doors. 1% [Above percentages are taken from a study conducted by the Queensland EPA].
- Coal load can be lost from the top of open wagons during rail transportation. 3% [Studies in the U.S. and Canada (Cape et al Cantor)]

The abovementioned issues need to be addressed by the implementation of Dust Dispersion solutions and processes.

1) Monitoring ambient dust levels at residential locations along the tracks.
2) Identification of locations that are at risk of impact due to dust from coal trains.
3) Trackside Monitor testing for types of coal particles as well as dust levels.
4) Assessment of potential dust control measures and benefit analysis.
5) Surface treatment to the coal to reduce airborne dust when handling coal i.e. loading and unloading wagons.
6) The installation of covers over each rail wagon.
7) Dust monitoring integrated with the train loading procedures.
8) Rail wagon spray system
9) Monitoring of ambient dust levels in close proximity to the tracks
10) Quantifying the potential risk of environmental harm posed by each dust source

In hot dry climate conditions dust emissions greater than 200 mg/m3 can be experienced and clearly visible around the moving trains.

Train derailments investigated in the U.S show that dust buildup associated with open-topped wagons can prevent water from draining from track beds. This can push steel rails out of gauge and cause derailments.

- How often will proper routine track maintenance be done?
- How many wagons will be open-top i.e. uncovered coal loads?

The ARTC 'HUNTER VALLEY RAIL STRATEGY'

(this covers the Hunter Valley network from the Port of Newcastle through to Maitland, Muswellbrook, Ulan and Narrabri)

"Apart from loop and track building, other capacity enhancements plans that the Strategy identifies include:

- relocating refueling points away from the coal terminals to reduce congestion:
- constructing more holding roads within the coal terminals
- continuous flow of trains to reduce congestion
- duplicating the railway line in some sections or constructing bypasses".

[Vol.1 Air Quality Ch. 14 Sec.14.4 Rail corridor or capacity]

1. More duplication should not be considered where a bypass can be physically constructed (the expense should be shared amongst he coal companies that will be using the rail corridor)
2. Where will the refueling points be located?
3. PN and QR will have fuel (diesel) storage facilities at Greta and Hexham. How much fuel will be stored at each location?
4. PN and QR will each use 38 trucks to transport the fuel. A total of 72 trucks, which means an additional **144 truck trips** on our roads. How many trucks per day?
5. A consent condition at Greta means that B double's cannot be used. How long will this condition be in place? Are the conditions likely to change in the future?
6. How many a) rigid trucks and b) articulated trucks will be used for transporting fuel?

"Further strategies that ARTC will consider to meet prospective volumes include: Additional arrival roads for Kooragang Island;

- Improved tunnel ventilation to allow train spacing to decrease:
- Increasing train speeds;
- Changing train lengths;
- Moving locomotives to the middle of each train to distribute power".

[Vol.1 Air Quality Ch. 14 Sec.14.4 Rail corridor or capacity]

7. Decreasing train spacing and increasing train will mean a non-stop continuous flow of trains along the rail corridor, and should not be considered.
8. "Additional arrival roads for Kooragang Island" The adverse impact on traffic along the MR108 (which includes Cormorant Road and Industrial Drive) is discussed at some length in the submission from 'The Stockton Community Action Group.'

"These plans are proposed to be implemented between 2011 and 2014 with projects beyond 2014 dependent on prospective volumes. If these works are undertaken, the Strategy predicts network capacity will meet or exceed the demand created by indicative contractual nominations for 2012 to 2020. It is predicted that network capacity will increase for most

sections of the line. The total increase on all sections between 2011 and 2015 is expected to be 225 Mtpa with a total capacity increase for the same period of 180 trains per day."
[Vol.1 Air Quality Ch. 14 Sec.14.4 Rail corridor or capacity]

9. When the total network capacity increases to **180 trains per day on all sections,** there will be **one train every 8 minutes!**
10. Obviously there will be duplication of tracks and rail loops to accommodate these figures. Where can we see a comprehensive plan of the projected track duplications along the rail corridors of the Hunter Valley?

ROADS and Heavy Vehicles

95,000 additional trucks will be entering and exiting main arterial roads, (MR108- Industrial Drive, Cormorant Road, Tourle and Teal Streets) from the minor industrial access roads which will be used to service the T4 construction.
There will be a total of 95,000 truckloads of materials, 186 per day, 19 per hour. However, these statistics provided by the assessment refer only to the truckloads of materials hauled one way to deliver loads to the construction site.
Each entrance and each exit is regarded as a separate 'trip.' Therefore there will be:

372 truck trips per day on the abovementioned roads or **38 trucks trips per hour!**
And this is without counting the number of heavy vehicles on the MR108 road network generated by existing industries, expansion and proposed industries.
[Vol.1 Ch.14 Traffic]
This will interrupt the flow of traffic, causing lengthy delays. Traffic congestion results in a number of problems, including economic costs due to delayed travel times, disruptions to commerce, frustration, reduced quality of life due to increased travel hours to and from work, air pollution and accidents. The T4 (especially during lengthy construction periods) can only compound Newcastle's infrastructure problems
Diesel exhaust from trucks will contribute substantially to PM10 particulates.

"PWCS welcomes the opportunity to work collaboratively with other industries on Kooragang Island to address matters relevant to the island generally. These may include dust, traffic…." [Vol.1 ch.7 Economics]

Has will this be done? Has a comprehensive study been undertaken to include traffic, dust and noise from all existing and proposed industrial developments in addition to those generated by the T4?

Shipping

The process of loading coal onto ships generates clouds of coal dust. It also needs to be noted that some countries purchasing coal request that dry coal be loaded, so water spray of those stockpiles would be kept to a minimum, thereby substantially increasing coal dust.

An additional 22 ships will enter Newcastle Port each week. This means more contaminants, chemicals, oil, and debris dumped or released into the harbour and near-shore waters.

An increase in coal shipment means that there is an increased risk of a shipping incident, including oil spills and collision. Although this would not fall within the scope of responsibilities for PWCS, this is an important issue that would need to be addressed by all the relevant government authorities when considering approval for the T4 project.

Coal dust in Homes and Places of Work

Degradation and soiling of buildings can affect human health e.g. deposition of dust particulates. Wherever there is visible coal dust deposition it is highly likely that there is exposure to finer dust particles of respirable size.

1) Properties near the vicinities of stockpile sites on Kooragang Island and PWCS coal terminals. Residents in Stockton have complained about the deposition of visible coal dust on flat surfaces such as windowsills. Analysis from samples taken by PWCS from complainants show that this dust is typically up to 20 % coal dust.
   This reveals that modelling data for the new terminal is inadequate and unreliable.
   . *Comprehensive, accurate modeling data is required prior to any approvals*.
2) Properties along the rail corridor in Newcastle and throughout the Hunter Valley will be affected by coal dust from trains.

Conservation and our Environment

Earmarked For Conservation: Saddleback Ridge, Bulga NSW. (Singleton Shire)
2003. The NSW government entered into a deed of agreement with Rio Tinto to retain Saddleback Ridge to
a) provide a barrier to mining noise and coal dust and
b) as a biodiversity offset, to ‘‘permanently protect’’ land in the non-disturbance areas and endangered animal and plant species.

And The Mistake: Incredulously, the deed of agreement was supposedly never implemented!
Coal & Allied has applied to mine and remove the ridge. Recommended for approval by the Department of Planning. (Awaiting approval by the commission)

And now more of the same

Earmarked for Conservation: Deep Pond Kooragang Island NSW. (Newcastle Shire)
Ash Island, to the west of Kooragang Island, forms part of Hunter Wetlands National Park. Last year the Labour Government included a 50-metre wide strip of land (located along the Hunter River estuary) for inclusion in the Hunter Wetlands National Park. This area includes Deep Pond, which is area’s last remaining drought refuge for migratory birds and protected fauna.
It was an essential and welcome inclusion to the State’s reserve system, reflecting a responsible attitude to conservation.

And the Mistake: State government reclassifies a parcel of National Parkland due to a ‘boundary error’ making it available to Port Waratah Coal Services for the T4.
The Minister for the Environment Robyn Parker states that this strip is zoned for port related activities “The former Government could not even get its mapping right. A fault in the process gazetted a national park right next to an internationally significant port—it could not draw lines properly on the map”.” Port Waratah Coal Services is proposing to expand terminal number four at Kooragang and the 50-metre wide strip of land is required for railway lines leading to a coal stockpile area.

“The Government is committed to protecting our natural environment and providing full consultation with our communities on the decisions that affect them.” [the Hon. Robyn Parker]

[National Parks and Wildlife Legislation Amendment (reservations) bill 2011. Bill introduced on motion by the Hon. Robyn Parker.]

The public were not notified of the change! This only came to light with the T4 Proposal. The public and other concerned parties were deprived of the opportunity to submit an objection to the re-zoning of land (prior to the release of the T4 assessment) to the Director-General and the Scientific Committee. Nominations could have been submitted for review of classification under the Threatened Species Conservation Act 1995 No 101, under the following clauses:

(a**)** it adversely affects threatened species, populations or ecological communities, or
(b) it could cause species, populations or ecological communities that are not threatened to become threatened

Timing constraints also precluded any other avenues of appeal that may have been available.

It seems that the 'mistakes,' oversights, and lack of public notification always favours mining interests and activities.

The Deep Pond Issue

Deep Pond will be destroyed. It will be filled in and used as a saline pond.
It is the last remaining draught refuge in the Lower Hunter Estuary system and is relied upon by migratory birds, with some species listed internationally as protected species

- At least 15 species of waterfowl of which 3 are listed as threatened under the TSC Act.
- It is a habitat for 23 threatened fauna species including Australasian bittern (Endangered, EBPC Act) and the
- Green and Golden Bell frog (Vulnerable, EBPC Act).
- Provides key foraging and roosting habitat due to it s proximity to RAMSAR listed wetlands in the Hunter estuary.
- The 312 ha project site includes 91ha of valuable native vegetation and 24ha of open water habitat.
- In particular: 18.8 ha of saltmarsh (an endangered ecological community under TSC Act) 28.9ha of mangrove and 27.3 ha of freshwater wetland of which 4 ha are listed as an endangered under the TSC Act.

The only offset area identified so far is Ellalong lagoon, some 50 kilometres away and which ***is not a drought refuge***. This offset does not represent like with like and therefore there is no beneficial environmental outcome as it fails to compensate for the loss.

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There is mention of another offset area but it does not identify:

- Location
- If it will be in the same immediate area.
- Size of the proposed offset.
- Whether it will be 'like for like.' This however is not possible as Deep Pond is last remaining draught refuge in the Lower Hunter Estuary system.

Who will benefit from this devastating sacrifice of Big Pond?
<u>When there are two alternatives</u>?
KTC, PWCS and the state government seem to be happy to sacrifice the last remaining draught sanctuary for wildlife!

"ARTC's site investigations for the holding tracks suggest that there are no good sites for construction of these tracks.
ARTC's analysis has concluded that the best available option is at Hexham, where it is believed that up to five tracks could be built, largely on land leased by ARTC with a small sliver of land currently owned by QRN also needing to be acquired. None of the potential sites on Kooragang Island are likely to be straightforward from either a construction or environmental perspective**.**
However, it is understood that current Terminal 4 planning may open-up an opportunity for additional arrival roads to be constructed for KCT, with the environmental issues addressed in the context of the larger project. At this stage though this option is too speculative and the timing of construction potentially too late to justify delaying the Hexham solution.

In regard to the at-grade junctions, there are essentially two options.

The long-standing position is that NCIG Stage 2 should provide for the KCT outbound track to fly-over the NCIG arrival roads.

The alternative is to construct a new outbound track around the outside of NCIG. This would effectively mean that NCIG would be on the inside of a larger loop, effectively eliminating the at-grade junction. This also has the advantage that the existing outbound track from PWCS could be reconfigured as a second inbound track.

Ultimately these issues and the preferred solution are a matter for the terminal operators and their shareholders. While ARTC sees advantages in the second option (the loop around NCIG with the current outbound track becoming a holding road) rather than the flyover solution, it is understood that current plans are likely to preclude that option."

[2011-2020 Hunter Valley Corridor Capacity Strategy Consultation Document March 2011 p14]

There is no need to destroy Big Pond (the last remaining wildlife draught refuge) for the sake of *convenience.* One of the above two options identified be by the ARYC could be implemented. Instead "current plans are likely to preclude that option" because it is a "matter for the terminal operators and their shareholders."
The proposed rail track will be built adjacent to (on the very outskirts) of Deep Pond, on OEH Wetlands taken for the project. Therefore Deep Pond will be encompassed within the proposed development area.

[Vol.1 Part C: Environmental Assessment Refer to: p100 Figure 7.1 "Location of sites A, B, C, D, E and F"]

<u>Further Environmental concerns for the river, aquifers and Hunter Wetlands</u>.
The T4 will be constructed on top of industrial waste material. Contaminated dredge material will be dumped on the site and packed down – without any remediation!
There are major concerns about seepage of highly contaminated industrial wastes into the underground waterways. The resultant highly toxic pollution to the Hunter River will have a destructive effect on fragile wetlands (National Park and RAMSAR listed) and marine life.

Protection of the wetlands was one of the reasons cited to stop the Tillegra Dam proposal in 2010.

THE GOVERNMENT, COAL INDUSTRY AND T4

'Summary of Assessment' (20/01/2012)
According to the 'Hunter Ports Unsolicited Proposal to NSW Government: Summary of Assessments' (NSW department of Premier and Cabinet), the 'disbenifits' of not proceeding with the T4 would be queued shipping and lack of investor confidence. Other 'disbenefits' cited were risks to The Long Term Commercial Framework for the Hunter Valley Coal Chain (HVCCT) and the Hunter Coal Export Framework.
According to the document, these 'disbenefits' outweighed any public 'disbenifits'

Economics
Australia's resource and energy commodity export earnings are forecast to reach a record $206 billion this financial year, according to the Bureau of Resources and Energy Economics.

Future Expansion
In 2011 Mr. Fullerton (from the ARTC) revealed to the Rural Affairs and Transport Legislation Committee that a number of mines are in the process of planning future capacity in the Hunter Valley.
There has also been some speculation that China Shenhua is negotiating with Newcastle Port Corporation over land currently leased to Buildev.(situated north-west of the Carrington coal loader) China Shenhua is pursuing private construction on this land, and would presumably transport its coal from the Liverpool Plains to Newcastle Port. This land is north-west of the Port Waratah coal services Carrington coal loader
Whilst the coal industry expands and reaps huge profits, vast acres of land become uninhabitable and unable to sustain any form of life. Human and environmental health suffers.

Coal Export: Now Versus later

"The T4 Project, by allowing this coal export to be brought forward in time has the potential benefit to Australia however will potentially forfeit any future net production benefits which may have arisen if the base case were to continue and the coal was shipped at a later date…. The cost of foregone net production benefits was deducted from the net production benefit to give the 'total net production benefit' (table 17.1)

The potential benefit is therefore the value of earlier coal production and export and is associated with the community preferring a benefit now rather than in the future"
[Vol.1 Ch. 17 Economics p298]

Community Preference ("the community preferring a benefit now rather than in the future")
The community would not choose to have a substantial increase in the amount of coal dust NOW. It is preferable to spread the existing coal export volumes over a period of time so that there is no *additional* increase to existing coal dust (and the associated health impacts).

COMMUNITY STACKEHOLDERS

"The total net production benefits of the T4 Project will be distributed between numerous stakeholders, including:

Local mining communities through mining company contributions to community infrastructure, for example donations and sponsorships." [Vol.1 Ch.17 Economics]

So will donations to the local hockey club or little league football club compensate for the wheezing, coughing, impact on asthma, and loss of time from school? Loss of time from work and the related financial loss? Hospital time? How about loss of quality of life and stress resulting from adverse health impacts of coal dust?

Coal Mine Stakeholder Preference

Evaluating the scenarios for delayed export times (i.e. no T4 and using existing terminals) which is assessed under Scenario 3.

"Under scenario 3 all production of coal would cease (due to for example the development of cheaper alternative sources of energy or a policy change resulting in coal production or export ceasing) Therefore it assumes that there will be no coal exported after 2050 (with or without the T4 Project) and assesses the costs and benefits of increased coal production and export to 2050 only." [Vol.1 Ch.17 Economics p298]

So the race is on to extract as much coal as possible regardless of the cumulative negative impacts this has on our environment -on the people, flora and fauna, land, rivers, aquifers groundwater, or ecosystems.

Mining Tax and net production benefits

There's no denying that the government collects revenue from mining companies. However the Minerals Resource Rent Tax (MRRT) may not have a significant benefit on the Australian economy. The MRRT will take effect on 01/06/2012. The 30% tax on the super profits of coal and iron ore miners is calculated by the government to bring in $10.6 billion over three years from July 1.

"Mr. Forrest said his company, Fortescue Mining Group, would pay little tax under the MRRT. This was due to the depreciation allowances of mining projects offsetting the liabilities under the MRRT. 'I've worked it out and I can tell you it is not much,' he said. Australia's second richest person said the impost would be on the small miners rather than the big miners such as BHP Billiton, Rio Tinto and Xstrata. 'It is a tax on the junior miners, it is not a tax on Fortescue.'Mr. Forrest said. 'The tax allows for the deduction of the existing assets, so mines that have existing production assets can claim that as a deduction and reduce their liability under the tax."

[Business Spectator News - Resources and Energy 30/04/2012]

Asked why Forrester was challenging the tax through court if he was paying little tax, CEO Neville Power said

"Our concern though is that it won't raise the funds that the government expects it to raise and therefore it will be changed and modified on the run and we'll end up with an even worse result which impacts the industry and affects mining investment long term."

[Stephen Bartholomeusz: Business Spectator 26/04/2012]

It seems that the benefits of mining taxes are far outweighed by the negatives such as coal dust related health care costs and the costs of irreparable damage to our environment.

The Australian Citizen

The voice of Australian citizens is drowned out by the thunder of foreign owned coal companies and multi-national investors.

It is a violation of human rights to subject the population to inhalation of coal dust particulates, toxic, polluted air and the associated health problems which often lead to pain, suffering, diminished quality of life, shortened life span as well as the financial burden of health care costs, loss of workdays and productivity.

It is a violation against nature and our wildlife to destroy an ecologically sensitive and irreplaceable habitat. The government needs to step in and stop the annihilation of Deep Pond which is the last remaining draught refuge for wild life in the Hunter River Estuary system. Australia and the world will be watching to see if the government will act as responsible caretakers of our land.

"The Government is committed to protecting our natural environment and providing full consultation with our communities on the decisions that affect them."

[National Parks and Wildlife Legislation Amendment (reservations) bill 2011. Bill introduced on motion by the Hon. Robyn Parker.]

Every process associated with coal – from mining, transportation, stockpiling, spraying and washing (leaching of contaminants), loading, dumping and handling of coal in large quantities, storage, combustion, and disposal of post-combustion wastes –has a destructive or detrimental effect on our environment and health.

The Time Constraints

The unreasonable amount of time given precludes me (and other members of the public) from the opportunity of making a thorough, comprehensive study of the "Port Waratah Coal Services Terminal 4 (T4) Development in Newcastle (10_0215)." and the associated research required. There are some 4,500 pages within these development application documents.

This limited amount of time given for public response may be in the best interest of the coal industry and the Department of Planning NSW, but it does not serve the best interest of the public.

[Declaration: I have not made a disclosable donation in the past 2 years.]

Yours Sincerely,

Vicki Warwyck