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NSW GOVERNMENT Health
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27 April 2012

Ms Rebecca Newman
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Dear Ms Newman

PORT WARATAH COAL SERVICES LIMITED
ENVIRONMENTAL ASSESSMENT TERMINAL 4 PROJECT

I refer to the Environmental Assessment exhibited on the NSW Planning & Infrastructure website in relation to the Port Waratah Coal Services project proposal for the construction of the Terminal 4 (T4) Project on Kooragang Island next to existing coal loading infrastructure and on the opposite side of the Hunter River to Mayfield North.

The T4 Project proposes a throughput of 120 Mtpa in addition to Port Waratah Coal Services approved current capacity of 145 Mtpa (120 Mtpa through Kooragang Coal Terminal and 25 Mtpa through Carrington Coal Terminal). The addition of the T4 Project is a significant increase in coal throughput through the port of Newcastle.

This office receives complaints from residents of suburbs in the proximity of the Port of Newcastle such as Carrington, Mayfield, Mayfield North and Stockton with respect to deposition of coal dust and health impacts of Particulate Matter on their families. During the response to the Orica incident in August last year It became evident to Hunter New England Population Health staff that the expansion of coal loading facilities was one of the greatest stated concerns for residents in neighbouring suburbs of the Port of Newcastle. Residents anecdotally report increasing coal dust impacts as coal handling and loading has expanded. PWCS currently report frequent inquiries from the community regarding noise and dust.

Air quality

The Environmental Assessment for the T4 Project suggests little impact on modelled air quality parameters as a result of the operation of T4. The modelled air quality outcomes as a result of the T4 project claims no additional 24-hour average PM_{10} concentration exceedances as a result of Stage 1 Construction, Stage 1 Operations/Stage 2

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Construction and Stage 3 Operations. The modelling report claims that the T4 Project contribution on the baseline exceedance days for PM_{10} is less than 1 $\mu g/m^3$.

However, the T4 Project Environmental Assessment notes that there are already exceedances of the 24-hour average PM_{10} of 50 $\mu g/m^3$ in the vicinity of the T4 project based on 2010 air monitoring data. Further the Assessment claims that no increase in the number of exceedances of the 24-hour average PM_{10} criterion would be expected due to the project. However, it should be noted that the 24-hour average PM_{10} levels in inner city Newcastle in the years immediately prior to 2010 were much higher. Therefore the Environmental Assessment should include a justification for assuming the PM_{10} levels in 2010 would be a realistic baseline for modelling future particulate levels or alternatively use, as a baseline, average levels over a longer period of time. While the modelling suggests there will only be a minimal increase in PM_{10} due to the T4 project, this needs to be balanced against both a community and public health expectation that particulate levels should be reduced in inner city Newcastle not increased.

It is our understanding that the NEPM tolerance of five exceedances per year for natural events such as bushfires is not considered appropriate in the Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales (DEC 2005). Additionally, the worked examples in the "Approved Methods" relate to situations where predicted project emissions lead to an exceedance of the standard in a setting where the baseline air quality meets the standard. In the EA, Chapter 12, Air Quality, on page 235 it is states as follows:

"The results in Table 12.4 show that for the worst-case day of the year, the baseline 24 hour average PM_{10} concentration exceeds the relevant criterion at all assessment locations, with or without the T4 project. The T4 Project contribution on the baseline exceedance days is less than 1 $\mu g/m^3$ for all assessed scenarios."

In table 12.5 the EA seeks to demonstrate there is no increase in the number of exceedances of the 24 hour average PM_{10} concentration, but this may be of questionable relevance where there are exceedances at baseline and the project exacerbates the exceedances. Additionally, the Approved Methods recommend upper range percentile estimates for modelled impacts and it would appear prudent to seek specific advice from the OEH on whether the appropriate estimates of uncertainty have been built into the predicted particulate impacts.

The T4 Project with 120 Mtpa throughput of coal will result in a substantial increase in coal train traffic to and from the Port of Newcastle. The Environmental Assessment considers air quality issues around rail transport of coal to the Port of Newcastle only briefly. Return of trains to the Upper Hunter Valley is not considered.

The Environmental Assessment considers that the T4 Project will have peak 24-hour PM_{10} concentrations for coal trains travelling to the T4 coal loader within the range of 3 to 13 $\mu g/m^3$ within 20 meters of the rail corridor. Further, that there are some 100 houses within 20 meters of the rail corridor between The Port of Newcastle and Muswellbrook. The Environmental Assessment acknowledges that rail transport and Pollution Reduction Program along the rail corridor is not part of the T4 Project but rather within the realms of the Australian Rail Track Corporation (ARTC). There is also acknowledgement that ARTC is currently studying fugitive coal dust emissions from coal trains.

It is the view of this office that the contribution of coal dust from coal trains beyond 20 meters of the rail corridor needs to be carefully considered as a contribution to the cumulative impact on air quality and necessary mitigation strategies.

A comprehensive environmental assessment could have considered the diesel exhaust emissions from both the extra rail and sea transport associated with this significant expansion of the coal transport chain.

Social impact and stakeholder and community engagement
The Environmental Assessment makes claim to the identification of all relevant stakeholders including state government agencies. It is of concern that neither the NSW Ministry of Health or Hunter New England Local Health District were directly engaged in the stakeholder consultation in relation to the T4 Project.

The social impact of this development is important. Coakes Consulting have conducted an extensive consultation program including over 400 interviews with residents, and consultation with 91 members of stakeholder groups, public meetings and newsletter distribution, however, aspects of the reporting and interpretation of this consultation process should be reviewed.

There appears to be an important error in the stakeholder engagement and social impact assessment relating to the percentage of surveyed residents who supportive of the project "going ahead". In Part B, Chapter 5, Stakeholder Engagement on page 87 it states that "of the 71% of respondents that indicated they were aware of the T4 Project, approximately **61**% were supportive (moderately to highly supportive) of it going ahead.

However, in Appendix R (the last of 60 documents comprising the EA) on page 16 it is stated that " a total of 71% of respondents indicated they were aware of the T4 Project, and of these, approximately **45**% were supportive of the T4 project going ahead. The **45**% figure is repeated again in this section on page 104.

This is a significant difference in reported community support and it should be resolved. Additionally, it is difficult to describe the level of support for the project as displayed in Figure 6.17 as "broadly positive" when four of the five suburbs close to the T4 project have a mean support rating of less than 5.5 out of 10. A positive rating would presumably be greater than a neutral rating of 5.5.

The EA does not provide sufficient information to assess the quality of the community consultation and engagement process. Figure 6.13 – perceived impacts on community engagement suggests a predominantly negative perception and impact on communications and consultation on the part of the council and community resident stakeholders. More information on the level of satisfaction with community and stakeholder consultation would be useful in assessing the outcomes of this project.

Noise
We note the frequency with which noise is raised as an issue by stakeholders in this EA and in past complaints. It is stated that the T4 project will only result in a marginal increase in noise above that of the current coal loader. Given that the current noise levels are not

well tolerated by the community, it calls into question the value of noise modelling that predicts a marginal increase will be acceptable.

In future we would appreciate being included as a stakeholder agency in any developments that involve emissions to air, water, or soil that could have, or could be perceived to have, an impact on public health so that we can contribute to the DGRs and consider the EA from the commencement of the exhibition period.

Yours sincerely

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Hunter New England Population Health