

## **Objection to Proposed Fourth Coal Export Terminal in Newcastle**

**Project Title: Port Waratah Coal Services Terminal 4**

**Application No: 10\_0215**

Our Association wishes to object to the proposed Fourth Coal Export Terminal in Newcastle. The supposed "benefit" of this is far outweighed by the costs: the costs to the environment, the health of the community, the social and economic fabric of the community. It should not go ahead. Detailed are below our some of our reasons for our objection.

### **Impacts on habitat, endangered and threatened species, and migratory birds**

- Part of the 4<sup>th</sup> terminal site is currently National park. The National park lands include critical habitat for migratory shore birds that needs to be protected. National park lands must not be included in the proposed development.
- 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.
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- Loss of habitat for 23 threatened fauna species including Australasian bittern (Endangered, EBPC Act) and the Green and Golden Bell frog (Vulnerable, EBPC Act).
- Loss of habitat and the disruption to an ecologically significant proportion of a population for four migratory shorebird species listed under international conservation conventions. At least 11 species of migratory birds recognised by international treaties rely on the habitat of deep pond and its proximity to the RAMSAR listed wetland.
- Off sets cannot hope to compensate for loss of habit at the site. The proposed off-set site at Ellalong has already been identified as critical for conservation in its own right. It is also approximately 50 km away from Koorigang Island, therefore fails to compensate for the loss of Deep Pond, which provides key foraging and roosting habitat due to it s proximity to RAMSAR listed wetlands in the Hunter estuary.
- Deep Pond is the only freshwater drought refuge in the Lower Hunter Estuary system. It is relied upon by at least 15 species of waterfowl of which 3 are listed as threatened under the TSC Act.
- Due to high value habitat and the protected species dependant on it, plus its key relationship with the nearby RAMSAR listed wetlands, Deep Pond needs to be protected and management coordinated with the ongoing conservation efforts in the Hunter Estuary.

### **Air Quality**

- The environmental assessment downplays the effect the 4<sup>th</sup> terminal would have on air quality stating " *The T4 project is not expected to result in any criterion exceedences on any additional days of the year*"<sup>1</sup>. It defies belief that the uncover coal stockpiles for a coal loader of the size of T4 will not increase the amount of coal dust effecting Newcastle suburbs.
- The project does not plan to implement best practice for dust control measurements. Best practice would be not to have any stockpile.
- The EA only considered trains to affect residencies within 20m of the rail line. This is does not represent an adequate assessment of the air quality impact of increased coal transport as a result of the 4<sup>th</sup> terminal.
- The current guidelines are outdated and fail to account for the findings of ongoing health studies which demonstrate that total suspended particles (coal dust) are of greater detriment to human health than when the guidelines were put in place.
- The precautionary principle should be applied to potential health impacts of the T4 proposal. Approval should be not be allowed until a more conclusive health and air quality study is undertaken for the Newcastle LGA.

#### Dredging and water pollution

- There is no plan to fully remediate the heavily contaminated T4 site. The T4 proposal will therefore cause the leaching of existing toxic material into groundwater and surrounding surface waters via a 'squeezing effect'. Result will be pollution of both the neighbouring (National Park and RAMSAR listed) wetlands and the Hunter River.
- An increase in shipping will negatively impact harbour water quality with sediment disturbance (some of it contaminated), release of bilge water, more antifouling agents, chemicals and oil spills, and dumping of debris. It will also reduce access for other harbour users and increase the risk of introduced species.
- The T4 proposal requires the realignment of the banks of South Arm of the Hunter River and construction of a 'turning circle' or 'swing basin' to accommodate the world largest ships. The proposal also requires dredging of the South Arm of the river from its natural depth of 2m to 4m to 16.2m with 17.8m deep shipping berths along each bank.
- The dredging will have massive impacts including the removal of aquatic habitats and impacts on estuarine habitats via changes to tidal hydrodynamics and salinity. Also potential of creating stagnant deep holes, altering currents, causing river bed erosion and liberating pollutants which are currently trapped within the bottom sediments.i
- The EA fails to deal adequately with the impact of the massive dredging necessary for T4. The approval for South Arm dredging, given by the previous State government, should not be relied on for a significantly different proposal.

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<sup>1</sup> P243 Vol 1 Air Quality report

### Social and economic impacts on Newcastle and Lower Hunter

- There is no additional operational employment associated with the T4 Project
- Loss of other economic activities in the port, like tourism, fishing and other shipping.
- The project would facilitate an increase of at least 41 additional coal trains per day through the suburbs of Maitland and into Newcastle. This Increases congestion on the rail lines, noise and dust.
- Noise and vibration from site operations 24 hours a day, 7 days per week.  
Increased traffic congestion through construction period.
- Impacts on commercial fishing are expected from the loss habitat and contamination.ii

### Impacts of increased coal mining in NSW

- The completed project would facilitate the equivalent of at least 15 more large coal mines in the Hunter Valley and Liverpool plains.
- The Costs of more mining to the State include: Green House Gas generation at mines, loss of agricultural lands, blasting, noise, air quality, loss of aboriginal and non-aboriginal heritage, visual impacts, loss and pollution of surface water and groundwater, damage to aquatic ecology, flora and fauna loss.
- Research shows the health impacts of the coal industry estimated at \$2.6 billion Australia wide. Pollution from coal affects all major body organ systems and contributes to the leading causes of morbidity and mortality. In the Hunter Valley this impact is all the more prevalent due to the proximity of coal mining, transport and infrastructure to communities. The 4th terminal project would facilitate a massive increase to health impacts in the region, for this alone the negative contribution of the project far outweighs any merits.
- 22 more coal ships visiting Newcastle every week, pushing out other port users and the potential investment of other port industrial, commercial, tourism opportunities.
- The 4th terminal would provide for the equivalent of 15 more large power stations around the world, meaning an extra 288 million tonnes of carbon dioxide per year fuelling the global climate crisis.

### Overall

- The strategic need for the project does not justify its approval. The current pace of coal mining expansion in the Hunter region is already coming at a cost to the environment and human health that far outweighs the benefit of royalties it provides in return.
- The 4th terminal project depends on further mines and expansion of existing mines that are not guaranteed to occur. The upgrading of PWCS exiting terminals and the new NCIG 3rd terminal (to 211 million tonnes total from 89 million tonnes in 2002) can already accommodate for a large increase in coal exports from Newcastle.
- To approve additional export infrastructure (to 331 million tonnes in total) and destroy the ecological values of the T4 site takes no account of the potential decrease in the commercial viability of coal sales in the future.

Sincerely

Jolieske Lips  
President

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