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This is a submission objecting to the proposed Port Waratah Coal Services Terminal 4 development in Newcastle (10_0215). The T4 proposal must not be approved due to the significant and unacceptable impacts as detailed below.

LOCAL ECOLOGICAL IMPACTS

The proposed development would result in loss of habitat for 23 threatened species of fauna, including the Green and Golden Bell frog and the Australasian Bittern. It would also result in disruption to an ecologically significant proportion of the population of four migratory shorebirds listed under international conservation conventions. At least 11 species of migratory birds recognised by international treaties and 15 species of waterfowl (three of which are listed as threatened under the TSC Act) rely on the habitat of Deep Pond and its proximity to the RAMSAR listed wetland. Deep Pond is in fact the only freshwater drought refuge in the Lower Hunter Estuary system. Deep Pond should be protected, and its management should be coordinated with the ongoing conservation efforts in the Hunter Estuary. An area of the development would take place on land previously gazetted as National Park. This area should not be part of the proposed development. Furthermore, the project site includes 18.8ha of Saltmarsh (an endangered ecological community under the Threatened Species Conservation Act), 28.9ha of mangrove and 27.3ha of freshwater wetland, 4ha of which are listed as an endangered community under the TSC Act. Offsets cannot compensate for the loss of habitat at the project site. The proposed offset site at Ellalong has been identified as critical for conservation in its own right. Furthermore, the offset site is 50km away from Kooragang Island, which is too far away to provide the ecological function of Deep Pond. Deep Pond provides key foraging and roosting habitat due to its proximity to the RAMSAR listed wetlands in the Hunter Estuary.

IMPACTS ON AIR QUALITY AND HEALTH

The Environmental Assessment downplays the impact of the project on air quality. The EA only considers the impact of increased coal train movements on residences within 20m of the rail line. However, the impacts of coal dust are likely to extend far beyond these boundaries. More uncovered coal stockpiles will increase the amount of coal dust already affecting Newcastle suburbs. The precautionary principle should be applied to potential health impacts of the T4 project. Approval for the project should not be given until a comprehensive health and air quality study has been conducted across the Newcastle LGA. The health impacts of the coal industry are estimated to be around \$2.6 billion across Australia. Pollution from coal affects all major body organ systems and contributes to the leading causes of morbidity and mortality. The 4th terminal project would increase negative health impacts in the Hunter region. For this reason alone, the project should not be approved.

DREDGING AND WATER CONTAMINATION

There is no plan to fully remediate the heavily contaminated T4 site. The T4 proposal could therefore cause the leaching of existing toxic material into groundwater and surrounding surface waters via a 'squeezing effect'. The result will be pollution of both the neighbouring (National Park and RAMSAR listed) wetlands and the Hunter River. 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, it has the potential of creating stagnant deep holes, altering currents, causing riverbed erosion and releasing pollutants that are currently trapped within the bottom sediments. A study should be conducted to investigate this issue. 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 increase the risk of introduced species. The T4 proposal requires the realignment of the banks of the South Arm of the Hunter River and construction of a 'swing basin'. The proposal also requires dredging of the South Arm of the river from its natural depth of 2-4m to 16.2m with 17.8m deep shipping berths along each bank. The area that will be dredged has changed significantly after the State Government gave the dredging approval. PWCS should apply for a new license for dredging, given that the proposal for dredging has changed significantly.

LOCAL SOCIAL AND ECONOMIC IMPACTS

After construction, the T4 proposal will provide no additional long-term employment. Rather, the 22 extra coal ships per week that the T4 project will bring is likely to push out other economic activities in the port, such as tourism, fishing and other exports. It is also likely to impact commercial fishing due to the loss of fish habitat and increased contamination from dredging. T4 would facilitate an increase of at least 41 additional coal trains per day through the suburbs of Maitland and into Newcastle. This would increase congestion on the rail lines as well as increasing noise and dust. During the construction period, traffic congestion on roads is also likely to occur. The T4 project would also increase noise, light and dust pollution (mentioned in 'Air Quality' above). Noise, vibrations and light pollution from on-site operations will occur 24 hours a day, 7 days per week. **IMPACTS ON CLIMATE CHANGE AND INCREASED MINING** The T4 project would facilitate the development of at least 15 more large coalmines in the Hunter Valley and Liverpool plains. The EA should consider the cumulative social and environmental impacts of these mines. The costs of more mining to the State include greenhouse gas generation, 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. T4 would provide coal for the equivalent of 15 more large power stations around the world, generating an extra 288 million tonnes of carbon dioxide per year and fuelling the global climate crisis. Consideration of the impact of the 'Scope 3' downstream emissions of coal exported via the T4 project should be included in the Environmental Assessment.

Sincerely,

Steve Armstrong
