



The Planner

20/11/2013

Department of Planning and Infrastructure

Re: Submission to the Response to submissions and Preferred Project Report for the construction and operation of a coal export terminal at Kooragang Island.

To whom it may concern:

Thank you for the opportunity to comment on the Port Waratah Coal Services' (PWCS) Response to submissions and Preferred Project Report (RS/PPR). As the Greens NSW Spokesperson for the Environment and for Roads and Ports, I have taken the opportunity to make some comments on the proposal.

Overall, whilst I welcome the changes that have occurred during this process, such as the reduction in export capacity from 120Mt to 70Mt of coal, the response to submissions and preferred project report does not address issues raised by submissions to the Environmental Assessment (EA) of this project.

As such, I recommend that the fourth Newcastle coal terminal (T4) not be approved and built for the following reasons:

1. Climate Change

Climate Change has significant impacts on the world and on Australia. The United Nations World Meteorological Agency has noted that 2013 is likely to be one of the top ten warmest years since modern records started, and that Australia had the world's highest increase in average temperatures last summer¹.

A study in *Nature* in October found that if we do not act to reduce emissions, most of the world will experience unprecedented climate change by 2047². If we act to moderately to reduce emissions the date is pushed back by more than 20 years. It is therefore incumbent upon New South Wales to rapidly and urgently minimise emissions of greenhouse gases to reduce the likelihood of dangerous climate change.

¹ http://www.wmo.int/pages/mediacentre/press_releases/pr_981_EN.html

² <http://www.nature.com/nature/journal/v502/n7470/full/nature12540.html>

The Australian economy will be particularly impacted by climate change. HSBC has rated Australia's economy as one of the most exposed to climate change. Australia pays the second highest cost per GDP (0.24 per cent) on extreme weather events, behind only China, and is the fifth most exposed economy in the OECD³. In NSW, more than 60,000 residential properties would be vulnerable to inundation and extreme storm tides if there is sea level rise of more than one metre⁴.

The federal Department of the Environment estimates that "Between 43,900 and 65,300 residential buildings, with a current value of between \$14 billion and \$20 billion may be at risk of inundation from a sea level rise of 1.1 metres. A 1.1 metre sea level rise will also put at risk up to 4,800 km of NSW roads, up to 320 km of NSW railways, and up to 1200 commercial buildings. These assets have an estimated value of up to \$10.4 billion, \$1.3 billion and \$9 billion respectively"⁵.

NSW is one of the highest emitters of greenhouse gases in Australia. Around 75% of the state's emissions come from extracting, processing and burning coal⁶.

The proposed T4 will increase export of coal by 70Mt of coal a year, which when burnt will release around 174Mt of carbon dioxide into the atmosphere. Approving additional coal exports will drive increased carbon dioxide, greenhouse gases and exacerbate global climate change. The International Energy Agency recommends that to limit global warming to under 2 degrees Celsius, global coal demand must peak in 2016⁷, at least a year before Port Waratah Coal Services (PWCS) indicates T4 will begin operation.

There is clearly no economic or environmental justification for NSW to approve projects that contribute to climate change.

2. Impact on Wetland and Riparian areas

T4 is proposed to be built on the edge of the Hunter Estuary National Park, 18.5 ha of which will be removed from the Park to facilitate this project. The project will also develop lands held by the Office of Environment and Heritage under Part 11 of the *National Parks and Wildlife Act 1974*, which is intended to be managed for conservation. The response to submissions does not address the conflict and possible

³ <http://reneweconomy.com.au/2013/hsbc-australian-economy-badly-exposed-to-climate-56343>

⁴ <http://www.ga.gov.au/ausgeonews/ausgeonews201103/climate.jsp>

⁵ www.climatechange.gov.au/climate-change/climate-science/climate-change-impacts/new-south-wales

⁶ <http://www.environment.nsw.gov.au/climatechange/emissionsoverview.htm>

⁷ <http://www.worldenergyoutlook.org/publications/weo-2011/>

illegality of using lands owned and managed under the *National Parks and Wildlife Act 1974* for industrial development.

The Hunter estuary is an internationally recognised wetland protected by the RAMSAR Convention. It is not appropriate for these wetlands to be considered replaceable either through biodiversity offsets or credits. The proposal to acquire habitat areas at Brundee (near Nowra) and Ellalong Lagoon (near Cessnock) does nothing to offset impacts on species occurring in the Hunter estuary as they are not directly comparable. The proposed Ellalong Lagoon offset area, the proposed Brundee offset area and the proposed Tomago offset area, are all different habitats and ecosystems to the area that will be destroyed. They are also located between 40 to 250 km away, meaning little ability for affected fauna to migrate to the new area, even if it was directly comparable.

The 23 hectare freshwater drought refuge of Deep Pond, which will be affected, supports at least 11 species of migratory birds, including sharp-tailed sandpiper, curlew sandpiper and marsh sandpiper recorded⁸. T4 will destroy 80 per cent of Deep Pond.

Similarly, the 2.3 hectares of will be destroyed by T4. Swan Pond is public land, owned and managed by the National Parks Service under Part 11 of the NSW *National Parks and Wildlife Act*. It is part of a highly successful long-term restoration project, the Kooragang Wetland Rehabilitation Project (KWRP).

3. Impact on Endangered Species

The Hunter Estuary supports 112 species of waterbirds and nationally and internationally listed threatened species, including the Australasian bittern (*Botaurus poiciloptilus*), listed as endangered under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), green and golden bell frog (*Litoria aurea* Swan Pond), listed as vulnerable under the EPBC Act 1999 and known to breed in the Ramsar site, and the estuary stingray (*Dasyatis fluviorum*), listed as vulnerable on the International Union for the Conservation of Nature Red List. Important habitats that will be impacted by the construction of T4 include Deep pond, Railway pond, Bittern pond and Swan pond.

The T4 project area covers a significant proportion of the existing Green and Golden Bell Frog habitat in the Hunter estuary and it is highly likely that the majority of the population in the project area will be

⁸ <http://www.ereamae.com/SiteLists.aspx?Site=4641>

adversely impacted due to the removal of key habitat for this species⁹. There is no certainty that the proposed management measures for Green and Golden Bell Frog within the T4 site or habitat creation at the proposed Tomago offset area will be effective in protecting the species in the region. Establishment of a research program is an adjunct to conservation and does little to conserve biodiversity while habitat is being lost from direct impacts. I strongly recommend the precautionary principle when considering the habitat of threatened species.

4. Air Pollution and Health Impacts

The cumulative impacts of air pollution from coal mining is causing considerable health risk for the communities in Newcastle and the Hunter Valley. In particular, health impacts from the coal dust from the mining, transport and stockpiling of coal include cardiovascular disease, asthma and heart disease. According to the Hunter Community Environment Centre (HCEC), an additional 70Mt of coal exported will mean roughly 7,000 additional trips of 80 wagon trains between the Hunter mines and the port and back again, the capacity to export coal from an additional 8 to 10 mega mines and four new 1.5km coal stockpiles will substantially add to Particulate Matter (PM10) emissions in Newcastle and the Hunter Valley¹⁰.

The dust from empty, uncovered and unwashed coal hoppers will likely pose significant risk to residents along the rail line as trains return empty to the Hunter Valley. Similarly, there are an estimated 30,000 residents living within 50m of the coal rail corridor¹¹. These air quality issues have not been adequately addressed in Response to submissions and Preferred Project Report

5. Economic Case for the Development

The Greens NSW believe the public benefit from the T4 will not exceed the environmental and social costs of its development. There is little evidence of the coal market requiring additional port facilities. In 2012, the existing port infrastructure of Newcastle exported 141Mt of an estimated 211Mt capacity¹². Hence, there is significant underutilisation of the current facilities.

⁹ <http://www.pwcs.com.au/pages/design/links/uploaded/EMGAEPBCActT4FinalReferralLowRes.pdf>

¹⁰ <http://www.hcec.org.au/20131017/submission-guide-detailed-t4-preferred-project-report>

¹¹ <http://www.abc.net.au/catalyst/stories/3831563.htm>

¹² <http://www.newportcorp.com.au/site/index.cfm?display=111729>

It is unclear how many jobs will result from the operation of the addition of the T4 terminal. The 80 jobs suggested are not enough to justify large environmental and public health risks. The Government would be far better placed to promote alternative industry in Newcastle that generates jobs and protects the environment. This includes thousands of green jobs in the renewable energy industry, manufacturing and tourism.

6. Conclusion

In conclusion, due to the significant environmental and public health costs of the development and the comparatively small economic benefit to the communities affected, I recommend this proposal not proceed.

Thank you for the opportunity to comment on the "Response to submissions and Preferred Project Report for the construction and operation of a coal export terminal at Kooragang Island".

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