

Ms Rebecca Newman
Infrastructure Projects
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

22nd November, 2013

Dear Ms Newman,

RE: PORT WARATAH COAL SERVICES –TERMINAL 4 PREFERRED PROJECT REPORT

I am writing on behalf of the Bylong Valley Protection Alliance in relation to the abovementioned report.

Bylong is located in the Upper Hunter of NSW, an area already impacted by increasing rail transportation of coal along the Sandy Hollow-Ulan line and slated for further potential mining development over the coming decade. What happens with respect to coal export capacity at the port of Newcastle is of direct relevance and concern to us.

We object to the approval of the Terminal 4 Project on the basis of substantial and unacceptable impacts, which have not – and most likely cannot – be adequately addressed. Chief amongst these are:

1. The inadequacy of proposed offsets:
 - The proposed acquisition of habitat at Ellalong Lagoon and Bundee – because of dissimilarity in the first case and remoteness from the region in the second – does nothing at all, in a direct sense, to mitigate impacts on Hunter Estuary species.
2. The unproven nature of proposed habitat creation
 - The proposal to build habitat for the bittern and migratory shorebirds is essentially experimental and unproven and cannot be relied upon, as is, as a compensatory solution.

3. Potential impacts on air quality in the vicinity

- The choice of 2010 as a base year for air quality modelling has been inadequately justified, a criticism raised previously by NSW Health and still unaddressed in the current proposal. Using an average baseline as an alternative it seems (from figures we have seen) that additional particle pollution from the project could well see daily exceedances numbering substantively above the National Standard.

4. Increased coal dust and diesel pollution along the rail corridor

- Increased tonnage will result in increased coal dust and diesel pollution levels along the total rail corridor. Relatedly, the proposal's continued focus on impacts only within 20m of the corridor (not any further) seems unreasonable not only from a common-sense point of view, but also as an implicit rebuff to NSW Health's earlier submissions which pointed to such narrow consideration being a potential deficiency in impact assessment.

5. Lack of clearly established demand/requirement

- We note projections by Goldman Sachs (as reported in *Climate Spectator*) of *total* Australian Coal exports of 194Mt by 2017 (the indicative possible start date of the T4 project), less than the *current* approved export capacity (211Mt) of the Newcastle port *alone*. From this perspective a clear need for the project simply doesn't seem to have been adequately established. PWCS's own estimates (as reported recently in the *Newcastle Herald*) do not align with these figures, raising a concern that they may be unhelpfully overstated and thus require a review.

With these key points in mind, we ask that the project not be approved.

Yours faithfully,



CRAIG SHAW
Secretary, Bylong Valley Protection Alliance
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