



PO Box 414, Hamilton NSW 2303

Major Planning Assessments
Department of Planning and Infrastructure
GPO Box 39
Sydney 2001

21 November, 2013

Dear Madam/Sir,

RE: Objection to the Port Waratah Coal Services Terminal 4

The Wilderness Society Newcastle appreciates the opportunity to lodge an objection to the Port Waratah Coal Services Limited (PWCS) export Terminal 4 (T4) project.

As Newcastle residents and as local environmental advocates, the Wilderness Society Newcastle is very concerned by this Forth Coal Terminal proposal. The project will facilitate increasing pressure on local Newcastle community health and pressure upon those communities already bearing the brunt of the impacts of coal mining impacts in their regional areas.

The natural areas under threat from this project are of international significance and should not be subjected to the increasing impacts of coal loaders, dust, rail lines, traffic and other associated infrastructure. The carbon emissions are also of international significance, and the increasing impacts on our global climate are unacceptable at this time, where scientific consensus and an increasing number of finance, investment and government bodies are calling for an end to coal mining and burning in order avoid the worst impacts of dangerous climate change.

This project will facilitate the pace of coal mining and number projects to increase during a time when communities are already suffering. Greater coal output from Newcastle is simply not acceptable to those already feeling the impacts of an industry that arguably should be decreasing in size. A move to increase the impacts at this time ignores climate science and economics.

Project Description:

PWCS proposes to construct and operate a new coal export terminal at the Port of Newcastle New South Wales (NSW). T4 will be built on Kooragang Island and the Hunter

River South Arm adjacent to KCT and the Newcastle Coal Infrastructure Group Pty Limited (NCIG) coal terminal. It will include the construction and operation of:

- New rail tracks
- Train unloading facilities
- Dump stations
- A coal stockyard
- Conveyors
- Wharves
- Berths
- Ancillary facilities
- Biodiversity offset sites and habitat restoration works at an offset site to the north at Tomago

Despite reducing capacity from 120Mt to 70Mt, the PWCS *Response to submissions and Preferred Project Report* does not adequately address the issues raised by the submissions to the Environmental Assessment (EA). The T4 project will have significant and unacceptable impacts. The Wilderness Society therefore object to T4 being approved and built. The reasons for objecting to this project due to unacceptable social and environmental impacts further are detailed below.

Migratory Birds and State and Federally listed Threatened Birds

The Hunter Estuary and Ramsar listed wetlands supports 112 species of migratory birds, 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). T4 will destroy 28ha of habitat known to support a population of the nationally threatened Australasian bittern. The PPR proposes a highly experimental proposal to build and create habitat for both the migratory shorebirds and Australasian bittern. There is no evidence to suggest that this will be successful therefore we recommend that no clearing or construction begin before this offset site is established and shown to be used by the species concerned. In addition the proposals to provide offset habitat at Brundee and Ellalong Lagoon is not providing 'like for like'. The proposed Ellalong Lagoon has different habitat attributes therefore cannot be counted as 'off-setting' impacts to migratory and threatened bird species.

The clearing and disturbance to bird foraging and roosting sites that will be impacted by T4 include Deep Pond and Swan pond. Deep Pond is a 23 hectare freshwater drought refuge that supports at least 11 species of migratory birds including the sharp-tailed sandpiper, curlew sandpiper, and marsh sandpiper. T4 will destroy 80 per cent of Deep Pond. 2.3 hectares of Swan Pond will be also be destroyed by T4 impacting on the sharp-tailed sandpiper, marsh sandpiper and common greenshank.

The impacts from light, dust, noise and traffic are also very serious impacts that have not been adequately considered.

Wetlands

Wetlands have intrinsic values and provide ecological services such as the purification of water, filtering of air and breeding grounds and sustenance for aquatic life. As such the externalities associated with clearing and damage to wetlands are vast. The Hunter estuary is an internationally recognised wetland listed under the Ramsar Convention and is already negatively impacted by the cumulative impacts of industrial development increasing the risks from the T4 project. T4 is proposed to be built on the edge of the Hunter Estuary National Park, 18.5ha of which was removed from the Park to facilitate this project. This is contrary to the Ramsar Convention that commits to maintaining the ecological character of their wetlands and ensures they are protected.

Green and Golden Bell Frog:

The construction of the Terminal infrastructure including rail lines and stockyards and associated clearing of 18.5ha of Hunter Estuary National Park and impact to local wetlands and ponds will negatively impact on the federally listed threatened Green and Golden Bell Frog (GGBF). The T4 project area covers a significant proportion of the existing GGBF habitat in the Hunter estuary. There is insufficient evidence to suggest that works done on the Tomago off-set site will successfully replicate GGBF habitat and support a healthy population and therefore the extensive clearing of habitat has a very high level of risk to the species.

There have been no studies conducted of the regional GGBF population and therefore the risks to this vulnerable species from this development are unknown. Therefore we recommend a baseline ecological survey to assess the population dynamics and status of the GGBF.

Groundwater

There is substantial uncertainty around the impacts of proposed ground and surface water management during construction and operation due to contamination issues or inherent differences in water quality between/within the site & surrounding habitats. Risks to groundwater include:

- Increased leaching of contaminated materials existing and introduced from the site into the groundwater; and
- Alterations to natural groundwater pressures in the unconfined and shallow aquifer due to dewatering, with potential impacts to the estuarine environment.

The precautionary principle should apply to management of these aspects if certainty cannot be provided.

Contribution to Climate Change

The burning of an additional 70Mt of coal a year will add about 174Mt of carbon dioxide to the atmosphere equalling 30% of Australia's total annual GHG emissions. The International

Energy Agency predicts that to limit global warming to under 2 degrees Celsius, global coal demand must peak in 2016, at least a year before PWCS indicates T4 will begin operation.

Air Pollution and Public Health

Newcastle and the Hunter Valley communities are impacted by dust from the mining, transport and stockpiling of coal. 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 PM10 emissions in Newcastle and the Hunter Valley.

In particular suburbs around the Newcastle Terminal such as Mayfield, Tighes Hill, Carrington and Waratah bear the brunt of the coal dust increasing the risk of respiratory illness. There are over 30,000 people living within 500m of the rail corridor and 23,000 students attend 16 schools. The submission to the EA by NSW Health noted that the contribution of coal dust from coal trains beyond 20m from the rail corridor needs to be carefully considered. This recommendation is ignored in the RT/PPR.

The additional 7,000 return train movements and more than 700 return ship movements necessary to deliver 70Mt of coal to and from T4 will significantly increase diesel emissions in Newcastle and the Hunter. Diesel emissions are listed as a known carcinogen by the International Agency for Research on Cancer. The submission to the EA by NSW Health noted the failure of the EA to address diesel exhaust emissions and recommended a comprehensive health assessment. The RT/PPR ignores this recommendation.

In conclusion, The Wilderness Society firmly objects to the Port Waratah Coal Services Limited (PWCS) export Terminal 4 (T4) project.

Yours Sincerely,

Prue Bodsworth and Naomi Hogan

The Wilderness Society Newcastle

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