PPR Section	Topic	Issue	Recommendation
3.1 & throughout	Overview of Modified Project	Conflicting statements regarding the capacity of the T4 project	The proposal varies throughout the document between a proposal for 70Mtpa nominal capacity, and 120Mtpa nominal capacity. For example, "site layout has been designed to accommodate future expansion … to achieve 120Mtpa". All impacts of the project should be assessed at this capacity if this is the intended export volume, including biodiversity, GHG emissions, particulate pollution, train and traffic movements. **The PPR should be revised to reflect the intended future volume.**
3.2	Timing and staging	Insufficient information provided regarding annual nominations and projected coal throughput	There is insufficient information provided to determine the extent of the capacity shortfall and the changes in forecast of the export volumes. This is critical information that directly addresses the issues around justification. On provided information, the project is not adequately justified. **Information about the current and anticipated nominations must be provided.**
		Adequacy of future projections	It is not clear on what basis the claims for future increased demand are being asserted. Is this due to the "overall trend"? If this trend is reliable, why wasn't the reduction in coal chain export forecasts foreseen. More information required to justify the assertion of continued expanding demand. On provided information, the project is not adequately justified. **Information used to estimate future demand must be provided.**
3.3	Land reclamation and ground improvements	Dredge material, fill volumes, containment cells	All of these designs are conceptual, and are insufficiently developed to be capable of adequate assessment. Contamination from previous activity at the site was a critical issue raised in the submissions on the EA. **The PPR must be revised to include detailed design of contamination management strategies to facilitate assessment.**
3.5	Coal stockyard and stockpiles	Lack of fugitive particulate emission controls	Redesign of the coal stockyard, stockpiles has not been designed to incorporate current best practice for fugitive particulate emission controls. Redesign of this facility must include fully enclosed stockpiles and conveyors, provision for controlled wash-down of spillage, dust extraction of conveyors at transfer points and dust suppression spray water system. Amendments should also include lids for coal wagons, which is within the scope of T4 to require as a condition of use. **The PPR must be revised to incorporate best practice standards for fugitive particulate emission management.**
3.8	Roads and access	Proposed traffic lights	Installation of traffic lights unacceptable due to traffic impacts at peak periods and in general. **The PPR must be revised to identify alternative traffic management arrangements that are socially acceptable.**

4.1.3	Management and monitoring (contamination)	Design of RAP	RAP design is also conceptual at this stage, and insufficiently developed to be capable of adequate assessment. This is an ongoing criticism from the EA. Provision must be included in RAP for adaptive management of contamination in the event that the proposed strategies are unsuccessful or fail. Each area and option for management must be subject to a risk assessment to determine likelihood and severity of further contamination. **The PPR must be revised to include detailed design of RAP to facilitate assessment.**
4.2	Acid Sulfate Soils	ASS Management Plan	**A site specific ASSMP must be developed before any further consideration of this project.**
	Interaction with HDC work	Level of Protection	Level of warranty or protection provided by the proponents for exacerbation of contamination is not sufficient. These are genuine concerns that go to the question of public cost in relation to the project. These concerns have not been addressed at all in the PPR. **The PPR must demonstrate how the risks of further contamination will be managed, without creating a public burden.**
5.1.2	Alteration to existing flood regimes	Channel construction and mitigation measures underspecified. Site surface water management plan does not specify trigger values or treatment of overflow.	More detailed design specifications are required to determine the extent to which these conceptual models are feasible, and deliver the requirements of the existing tidal flow regime. Similarly, precise detail on the site surface water management plan has not been adequately provided, particularly in relation to water quality trigger values and the treatment of discharges that exceed the predicted capacity. The current description of measures for surface water management is insufficient to adequately assess impact. **The PPR must be revised to include detailed designs for surface water management and channel construction activities.**
6.1.4	Biodiversity offset strategy	Insufficient evidence to demonstrate the feasibility of biodiversity offset strategy	The viability of the offset strategy must be demonstrated, shown to be an adequate substitute for proposed habitat removal, and supplemented by a permanent and funded adaptive management framework to ensure its effectiveness for the life of the project prior to any further consideration of the T4 proposal. **The PPR must be revised to include more evidence of the feasibility of the biodiversity offset strategy.**
6.1.2	Threatened species populations	Existing decline of migratory shorebirds	**Further research must be undertaken to ascertain the cause of the rate of decline of migratory bird species in the Hunter Estuary prior to the approval of any development** in the area with the potential to exacerbate the current accelerated decline.
7	Noise and vibration impacts	No assessment on the impact of noise and vibration on fauna in the adjacent National Park	There does not appear to have been any assessment of the impact of moderate noise exceedences on biodiversity in the National Park adjacent to the project site. Is there evidence to show that this will have no impact on surrounding fauna, and

			particularly no impact on the effectiveness of the proposed biodiversity management and offset strategy? **The PPR must provide more information on the impact of the noise and vibration impacts on the fauna species in the region.**
8	Air quality impacts	Particulate concentrations exceed WHO guidelines	The predicted maximum 24-hour average PM10 concentration identified in Table 8.4 exceeds the World Health Organisation standards. Clearly the project's PM10 contribution will exacerbate existing exceedences. **No project can be approved until existing air quality in the Lower Hunter is improved by appropriate measures implemented for particulate pollution mitigation.**
		Lower Hunter Particle Characterisation Study	Current EPA investigations into the composition of existing particulate pollution as part of the Government's Lower Hunter Particle Characterisation Study must be completed before any project with the potential to increase particulate pollution is approved. **The T4 assessment process must be postponed, pending the outcomes of the Particulate Characterisation study.**
8.2	Health effects of particulate matter and coal dust	Health Impact Assessment (HIA)	A health impact assessment, which details the positive and negative health effects of the proposal and considers impacts on vulnerable populations, must be conducted by the proponents prior to any further consideration of the T4 proposal. This should be completed as part of the response to community concerns on this issue. The absence of this requirement in the DGRs should not prevent the conduct of a rigorous HIA by the proponents. **The PPR should be revised to include a properly conducted health impact assessment.**
8.2.3	Adequacy of proposed measures	Predictive dust suppression system	More information is required in relation to the proposed predictive/reactive system for contingency dust management measures. For instance, what are the conditions, including windspeeds, under which the system is triggered? **The PPR should be revised to include more operational information about the contingency dust management measures.**
		Enclosure of stockpiles	Insufficient explanation is provided for why enclosed stockpiles are not considered feasible for the project. Greater explanation is required on this point. **The PPR should be revised to explain why the enclosure of stockpiles is considered unviable.**
9	Greenhouse Gas Emissions	Impacts of Scope 3 emissions to be assessed	Given the globally significant Scope 3 emissions from this project, the impacts of these emissions must be considered for the purposes of assessment, including their climate, environmental and human health impacts. Assessment of Scope 3 emissions are consistent with the DGR requirements for 'direct, indirect and cumulative impacts' of the project. **The scale of these emissions are sufficient to**

			reject the proposal.
		Scope 3 emissions inadequately mitigated	There are no proposed management or mitigation strategies submitted in the PPR to offset the full suite of GHG emissions from this project. **The proponent must supply some evidence that all reasonable steps to mitigate these impacts has been made.**