



22nd November, 2013

Rebecca Sommer
Infrastructure Projects
NSW Department of Planning & Infrastructure
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Dear Madam,

The Hunter Community Environment Centre objects to the development proposal outlined in the Preferred Project Report for the Port Waratah Coal Services Terminal 4 project, incorporating the Response to Submissions on the Environmental Assessment (hereinafter PPR).

On consideration of the PPR, the Hunter Community Environment Centre do not believe that the proposed mitigation and management strategies are sufficient to offset the environmental, health and climate impacts of the proposed development. The proposed strategies for contamination rehabilitation, dredging, acid sulfate soil management, and surface water management are under-specified and incapable of being assessed with confidence. The proposed biodiversity offset strategy is unproven and speculative. In both cases, the precautionary principle must apply to the consideration of this proposal – that is, the absence of scientifically robust information or scientific certainty should not be grounds for the project's approval. The onus in such cases on the proponents to demonstrate the effectiveness of the proposed mitigation strategies.

Further, in reviewing the PPR, the Hunter Community Environment Centre have found that the proposed strategies for the minimisation of fugitive particulate emissions are insufficient given current state of air quality in the Lower Hunter. Consideration of the public health impacts of the proposal in a concerted manner is entirely absent. Finally, the GHG emissions from the project are of such a magnitude to necessitate their consideration in the assessment process, and of themselves are sufficient justification for the refusal of this project.

We therefore urge the NSW Government to reject this proposal.

Please see the attached table for a detailed suite of issues and recommendations.

We would like to formally request an opportunity to address the public hearing of the PAC. We have not made a reportable political gift or donation.

Sincerely,

Dr John Mackenzie
Community Liaison Officer
Hunter Community Environment Centre

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