

21/11/13

I object to the T4 project.

In this submission I will compare the consequences of T4 against other options such as doing nothing, or alternative development of resources .

This includes the whole “chain” of coal mining, export and use. The owners of T4 are also the owners of the mines and would doubtless have interests in the markets where it is sold. I note the reiterated argument in the PPR that mining and use are “beyond the operational control” of T4. That is not a valid reason to discount their effects. It is in fact, disturbingly irresponsible. To argue by analogy: someone producing illicit drugs may argue they are not responsible for how they are used.

Alternate uses of land vs	Coal mining/export/use
Varieties of agricultural use can co-exist - horse studs, vineyards, or it can be left wild, or used for eco-tourism, industry	What can you do with vast open-cut coal mines whilst operational? Nothing except keep mining. After the mine has gone? Nothing, its just dead land.
Ecological balance & diversity can be maintained or enhanced.	“Ecology” is squelched. There are token gestures- isolated fringes- as if life can be hosted in a museumesque display. They suggest absurd ‘offsets’ so instead of having certain species here in the Hunter, we shall have them in the Illawarra! Its a bit like if a mining company wanted a 1/4 of your backyard, they could “offset” it by giving you the same area in say... Canberra, or Vanuatu- but I want things that live in the Hunter, to stay in the Hunter. The PPR does not address the Matters of National Environmental Significance satisfactorily. It is not good enough to threaten wetlands without an explicit plan on what action to take should the worst happen to the Ramsar listed wetlands.

Fostering communities- with resilience, adaptability, autonomy	Concentrates dependent workers in dormitory locations, who are powerless in teh face of dictates from overseas owners.
Sensible water use, recyclable, paid for in full	Unsustainable waste of water which is subsidised by taxpayers and denies everyone else in the region its use
Air quality generally unaffected	Enormous and costly impact on air quality. Monitoring of 2.5ppm totally inadequate. Lack of studies on effects of 2.5ppm. No commitment to improve monitoring to a standard acceptable to the concerned community (eg CTAG). Refusal to undertake minor amelioration- covering coal wagons and stockpiles. No reference to important studies on air quality and health by Beyond Zero and Australia Institute.
Agricultural, tourist, residential, industrial markets relatively stable and definite prospects for long term growth.	Coal markets as PPR admits inherently unstable. PPR assumes coal market will grow, but we are living in a time of dramatic change and there is ample evidence demand for coal will fall dramatically. To expand coal production during falling demand means undervaluing it. According to PPR, T4 is speculative: it will export according to the demands of coal producers who are mining companies who also own T4.

IN my other submission I said there is no explanation how the submissions, government feedback and concern to reduce environmental feedback resulted in the reduced figure of 70Mtpa. I contend that it has been reduced because proponents are aware the market is collapsing. That would also explain why they want to build T4 “in stages”.

I note the NCIG have 60mtpa capacity and PWCS 120mtpa @KCT &

25mtpa @ CCT, both are operating at about 60% capacity. That means CCT could cease operating without reducing exports, if NCIG & KCT were to adopt better techniques. It is absurd to think we have 2 consortiums with in effect about 80mtpa of unused exporting capacity. That signifies that T4 @70mtpa is unneeded, and also that CCT is unneeded.

Reducing existing coal exports slightly would increase the price per unit, and given that it is higher quality coal, it is unlikely to prevent sales continuing at approximately the same level in the interim.

As it stands, the T4 proposal is according to the PPR speculative, and it is speculative in an environment where if there was an increase in demand then demand would have to increase by over the combined 40% unused capacity of NCIG and PWCS. I believe Deutch Bank released a projection recently that showed global demand for coal only increasing by 20mtpa by the year 2020. So on this basis, approving a speculative notion like T4 is throwing the opportunity away to use valuable portside land for other uses.

Let me return to my unfinished previous submission- and I will say as an aside that I am furious with the necessity to keep protesting about T4 when there are human rights issues that demand attention. I hope I convincingly exposed the sham denial by T4 proponents re responsibility for scope 3 emissions. I recall reading in the PPR that it was “unscientific” to compare scope 3 emissions with all of Australia’s scope 1 and 2 emissions.

Why is that ‘unscientific’? What do they mean by ‘unscientific’?

The comparison was not meant to elucidate some mechanism of cause and effect, for instance comparing the effects of a medication with the amount taken to see if there is a dose-dependent effect. The comparison was illustrative. There is no need for it to be “scientific”. It rather amazes me that with all of their enormous resources the PWCS consortium hires a bunch of amateurs to write the PPR.

The PPR did acknowledge that GHG emissions may have non-linear effects. In other words, it acknowledges that there are ‘tipping points’- miniscule increments that can have disproportionately large outcomes. These non-linear outcomes are the language that economists use to refer to climate chaos. That is not something happening in the future. It is happening now. I refer you to my summation of Australian weather events this year in my

other submission. The significance of this is that it is time we ALL started to take seriously the necessity to decrease GHG immediately.

Proceeding with T4- even as a concept- does not do that. To commit itself seriously (not tinkering with scope 1 and 2 emissions- how many lawyers would it take to prove that GHG emissions of the order of 0.0000xs% were responsible for a tornado that flattens Sydney for example? )- to commit itself seriously to eliminating GHG within the shortest possible timeframe, PWCS needs to:

Decommission CCT and temporarily boost KCT throughput and also

Work in common with NCIG

And also in common with NCIG invest in renewables to the full extent of its resources.

Comparatively speaking, the GHGs that will be released if T4 is actually built and exports according to plan, is a fraction of the GHG effect from the plumes of previously unreleased methane that are rising up NOW from the Arctic seabed. If the T4 PPR is rejected, and should the multinational owners of PWCS and NCIG take this urgency to act responsibly on board, then the T4 proposal will not have been a fatal waste of time.

I hope so.

I expect to speak when the public meeting is held.

Regards

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