

The Department of Planning and Infrastructure
GPO Box 39, SYDNEY NSW 2001
Attention: Rebecca Sommer
Rebecca.Sommer@planning.nsw.gov.au

22 November 2013

Dear Ms Sommer,

Submission: T4 Project RTS and PPR (PWCS) - Application No 10_0215

I strongly objects to this project on the basis that the community health, environmental, and socioeconomic impacts will far outweigh any short-term benefits the project claims it will deliver.

I formally request the opportunity to present to the Planning Assessment Commission when it is called.

There are two supporting documents accompanying this submission. They are:

Appendix A. Economic Analysis by Rod Campbell (TAI)
Appendix B. Table of objections and failings of the PPR

I have read the Department's privacy statement and give consent for our details to be published. I have not given any reportable political donations.



Fee Mozeley
76 Dawson Street,
Cooks Hill, NSW 2300

Summary of Objections

I object to the approval of T4 on the following grounds:

- That the impacts of the proposal on endangered, threatened and migratory species are unacceptable when assessed against Federal Government guidelines, and inadequately mitigated by the offset proposals provided. The proposed offset strategy is demonstrably inadequate to deal with the project's residual impacts as specified by the proponents.
- That the impacts on the Hunter Estuary are unacceptable, and contravene international legal obligations for the preservation of ecological integrity of these wetlands. These impacts are not capable of mitigation within the current project design.
- That the Scope 3 GHG Emissions from the project are globally significant, and must be considered in the assessment of the project's impact. The scale of these emissions is of such significance to warrant an outright rejection of the proposal.
- That the project cannot be approved prior to the findings of the Lower Hunter Particle Characterisation Study, given the substantial contribution that the project will make to airborne particulates and air pollution generally in the Lower Hunter area.
- That the proposal falls alarming short of current accepted practice in fugitive particulate emission controls for a coal export facility.
- That the outline of measures for surface water management are insufficient to adequately assess impact. No approval for the project can be granted at least until the impact on water and contamination can be assessed.
- That the project cannot be approved in the absence of a health impact assessment, detailing the likely impact of air quality, noise, vibration on community health, and an assessment of the likely risks particularly to vulnerable populations such as children, the elderly, and those with chronic disease.
- The economic analysis of the purported benefits of the project is biased due to the choice of assessment methodology, and cannot be considered to fulfil the requirements for economic analysis to facilitate cost-benefit analysis of the project.

Further information

Newcastle already experiences pollution levels high enough to shorten life and inflict a range of respiratory and cardiovascular illnesses on Newcastle residents. With the additional pollution caused by the construction and operation of T4, pollution levels will exceed the standard regularly at all Lower Hunter monitoring sites.

In a city where most people fear the health impacts of coal dust and live with the reality of asthma and coal-coated homes, the proposed terminal will increase particle pollution concentrations by up to one-third.

The Project Report states that PM₁₀ concentrations will increase by up to 17.9 micrograms per cubic metre during construction and operation. International research has shown that every increase of 10 µg/m³ increases health impacts by 1-3% throughout the exposed community.

The New South Wales Government must act urgently to improve air quality in the Hunter. A responsible first step would be to postpone the assessment of the proposed fourth coal terminal until particle pollution in Newcastle is reduced to below the standards set to protect human health.

The NSW Government recently invested half a million dollars in the Lower Hunter Particle Characterisation Study to assess the levels and sources of PM₁₀ pollution. I urge Newcastle MP Tim Owen, Premier O'Farrell and the NSW Government to wait for the results of this study before assessing a massive development that will significantly worsen pollution.

Annual average PM₁₀ concentrations exceeded the World Health Organisation standard in seven of the last ten years at monitoring sites in Newcastle. The new monitoring station in Stockton regularly records exceedances of the national standard for 24 hour average PM₁₀ concentrations.

Local residents and community groups funded and conducted two air pollution monitoring studies during 2013. The first identified PM₁₀ levels up to 50% higher than the national standard at several suburban houses in suburbs close to coal stockpiles and train lines. The second confirmed that particle concentrations increase by up to 1200% as coal trains pass, with unloaded coal trains causing the highest levels of pollution. These studies were the first of their kind in Australia and are now being replicated by concerned residents in the coal-affected communities of Mackay, Brisbane and South East Queensland.

Particle pollution levels in Newcastle already exceeded the standard set by the World Health Organisation last years. The additional pollution caused by a fourth coal terminal would increase particle concentrations in urban Newcastle where community members are already exposed to harmful pollution levels.

The NSW Government must conduct a thorough Health Impact Assessment for the proposed coal terminal to assess the risk of hospitalisation, symptoms, disease and death among local residents exposed to current coal loader operations and the additional attributable impact of T4. This is especially important for the more than 32,000 Novocastrians who live within 500 metres of the coal corridor and the thousands living in the shadow of the three existing uncovered stockpiles.

The air quality modeling for T4 is based on pollution levels during 2010. Modelling based on just one year when pollution levels were at their lowest point during the last decade presents a misleading impression. The modelling should be repeated based on 10 years' data.

The economic case for T4 has unraveled. PWCS has based their predictions of jobs and revenue created by T4 on a type of economic modeling that has been widely rejected as biased and inappropriate for developments of this nature. The initial 120 million tonne per annum coal terminal wasn't expected to create any new jobs, yet PWCS says the smaller 70 Mtpa terminal will create 80 jobs. This doesn't stack up according to Australia Institute Economist Rod Campbell (see below).

Community opposition to T4

- Newcastle is the world's largest coal port and exports are set to double.
- The coal mining industry accounts for less than 8% of employment in the Hunter and this has steadily declined since the 1970s due to increased mechanisation. The costs of this expansion in coal exports outweigh the benefits.
- CTAG is an alliance of more than 20 community groups with thousands of members and supporters.
- Most people are concerned about the impacts of coal dust on health. Fewer than 10% of the community want a 4th terminal. Even people who work in the coal industry don't want a fourth terminal.

Health impacts

- There is no safe level of particle pollution. It causes asthma and hospital admissions, and kills more Australians than car crashes (according to the AMA).
- Our community is heavily polluted by the three existing coal terminals. Enough is enough
- PM₁₀ levels regularly exceed the national standard in the Lower Hunter
- People who live in Newcastle know about coal dust. It's in the air, it's in our houses and many people feel it's responsible for poor health. Many of us live and work close enough to coal trains and stockpiles that we're exposed to harmful levels of particle pollution every day - within 500m of the coal corridor 30,000 people live and 25,000 children attend schools.

Covering coal wagons

- Community groups have monitored air pollution twice during the last year. We crowd-funded our studies with more than 200 donations (\$6,000).
- In July 2013, CTAG hired two sets of Osiris monitoring equipment to study the 'signature' of coal trains by monitoring particle pollution levels as loaded and unloaded trains passed through Newcastle. They monitored PM₁₀, PM_{2.5} and PM₁ over three days in three residential areas (Beresfield, Sandgate and Mayfield) as 70 coal trains passed.
- The coal train monitoring study was undertaken with industry-standard equipment and expert advice and assistance. There is a massive increase in particle pollution when loaded and unloaded coal trains pass by. PM₁₀ levels – that's particles up to ten microns in diameter – increase to up to 13 times. These findings provide solid evidence that coal wagons should be washed and covered.

Hunter valley mining

- Coal is a major source of particle pollution, causing almost 90% of the Hunter Valley's PM₁₀ pollution (statistics presented at the Senate inquiry into air pollution in Newcastle this year by the NSW EPA).
- Industry has programs in place to control dust from mines, such as the PRP, but clearly they are failing.
- The stated aim of the Dust Stop program is to reduce 80% of the dust from haul roads, which represent less than half (40%) of dust emissions.
- There are 19 proposals for new or expanded mines in NSW (8 in the Hunter) to add to the existing 30 open cut mines (in the Hunter). Even if the Dust Stop program is entirely successful, increased open cut mining will result in a net increase in dust pollution. These mines would feed T4.

Urgent government action is needed

- The proposed fourth terminal would increase the volume of coal exported by approximately 50%, along with the number of coal trains and the size of stockpiles in and near urban areas. The Premier should put the proposal on hold until the coal wagons are washed and covered.
- Premier Barry O'Farrell should instruct the coal industry to cover and wash coal wagons. This is consistent with the recommendations of a Senate Inquiry report that was released earlier this year.
- More than 4,000 people have written to the Premier, Planning Minister and Member for Newcastle to express their opposition to the 4th coal terminal. The NSW government has a statutory obligation to protect communities from public health risks.

Appendix A.

Author - Rod Campbell, The Australia Institute, rod@tai.org.au, www.tai.org.au

Phone - 0438 503 249

Word count - 527

Too good to be true: T4 economic claims do not stack up

If something sounds too good to be true, it probably is.

Last week, Port Waratah Coal Service's (PWCS) CEO, Hennie du Plooy, [appeared in the Herald](#) claiming the proposed Terminal 4 project (T4) would "inject \$770million a year into the regional economy during construction and another \$418million a year" when operating.

So is this true?

The short answer is, no. PWCS's claim is based on a type of economic modelling which the [Australian Bureau of Statistics calls "biased"](#) and the [Productivity Commission says](#) is regularly "abused", usually to overstate the economic importance of specific projects.

It is the same sort of modelling that got Coal & Allied's Warkworth project into trouble, when it tried to claim that project would "create" 45,000 jobs. The chief judge of the Land and Environment decided this type of model was "[deficient](#)".

In fact, the original economic assessment of the T4 project suggests its annual operating costs will only be between \$45 and \$50 million per year. Since that assessment was made, the size of the project has "almost halved" according to PWCS, so the amount of money it will "inject" into the economy has presumably declined considerably.

The original assessment of the project said that it would not employ any extra staff - the existing PWCS staff would be sufficient to run the new facilities. The economic assessment of the revised, smaller project now claims it will require an additional 80 people. It is only through the use of the biased, abused and deficient modelling that PWCS is able to claim that thousands of jobs will be created.

The project will increase the Hunter region's capacity to export coal, but with the subdued outlook for thermal coal exports, it is unlikely such an increase will deliver the benefits that PWCS is claiming. Most of the profits from any increase in export volumes would, of course, flow to the overseas owners of the major coal companies.

Even if the claim of hundreds of millions per year were true, what does this mean in relation to the size of the Hunter economy? A recent [report by Deloitte Access Economics](#) estimates the Hunter region will produce more than \$40 billion worth of goods and services by 2015. PWCS's overblown estimates would represent a change of around one per cent. The real impacts will be much lower.

What strings are attached to the T4 project? What does the Hunter need to do to secure this less-than-one per cent "injection"?

For the terminal to achieve its economic potential, a lot more coal has to be dug up and exported. This means that a lot more bushland and agricultural land needs to be turned into coal mines. In turn, a lot more coal trains need to pass through Newcastle's suburbs.

At the site of the proposal, a significant wetland would have to be destroyed. And, of course, the extra coal being burned would contribute to climate change.

None of these costs are considered in the economic assessment commissioned by PWCS. If we take these costs into account and take a realistic look at the benefits, PWCS's claims about the T4 project are absolutely too good to be true.

Rod Campbell is an economist at The Australia Institute

Appendix B.

PPR Section	Topic	Issue	Recommendation
3.1	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.

PPR Section	Topic	Issue	Recommendation
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. 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. What is the 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.

PPR Section	Topic	Issue	Recommendation
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 is no assessment of the impact of 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? Please investigate this.

PPR Section	Topic	Issue	Recommendation
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 this 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.

PPR Section	Topic	Issue	Recommendation
	Adequacy of proposed 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.