



PCU049593

Woodville,
NSW 2321

**Submission on the Port Waratah Coal Services proposed Terminal 4 Coal Loader (T4)
Preferred Project Report**

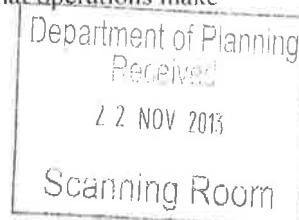
I wish to register my objection to the proposed Port Waratah Coal Services (PWCS) Terminal 4 Coal Loader (T4).

The grounds for my concern primarily concern the destruction of bird habitat in the Hunter Estuary, particularly the loss of habitat essential to migratory shorebirds and protected species like the Australasian Bittern *Botaurus poiciloptilus*. However, I am also concerned that the proposed development of coal export related infrastructure may not adequately provide the best possible protection for the Newcastle and Hunter Valley community with respect to exposure pollution, especially particulate emissions.

The case concerning the need, both legal and moral, to protect bird species in the Hunter Estuary has been comprehensively stated by the Hunter Bird Observers Club. I fully support and agree with their submission and do not intend to repeat their argument. I would like you to take my support of their statements seriously. I am one seven elected Fellows of BirdLife Australia and a former Chair of their research committee. I was award the 2012 Hobbs Medal for outstanding contribution to amateur ornithology in Australia. As a scientist committed to excellence my endorsement of the Hunter Bird Observers submission is not made lightly. Their case is factually based, supported by more than a decade of systematic study, initiated by a vision of the future need to protect the natural values of the Hunter Estuary. It is sad that various governments and land managers lacked similar vision, which should have resulted in a more balanced development of the area in which the environment and industry co-existed with minimal adverse impact on either function. If this had occurred the proposed destruction of environmental assets associated with T4 proposal might have been avoided.

The T4 proposal involves off-set provisions to compensate for the destroyed environmental land. Such provisions should be a last resort. The theme of my objection is that destruction may not unavoidable, but is a convenient option to the developer. However, I accept that off-set package provides genuinely significant environmental assets. The problem is that in one case, Ellalong Lagoon, it is not a case of "like for like" provision of compensatory habitat and the other component of the package involves habitat creation, which may not succeed.

I question the need for any further destruction of environmental land in the Hunter Estuary on the basis that existing infrastructure may not be operated at optimal capacity. During my professional career I was involved in de-bottlenecking large metallurgical operations where 25% increases in capacity were achieved within the existing environmental footprint of the operation. I have visited operations in Japan where similar gains were achieved by applying well known continuous improvement principles. In these examples the operators had no option but to optimise because there was no "free" land available adjacent to the operations. Exactly the position the T4 development would be if it was agreed there is no remaining land zoned for industrial development available and environmental land is not available. Expansion through optimisation is both possible and cost effective, usually decreasing capital expenditure requirement compared with new plant on an increased site footprint. I suggest that T4 project is rejected unless there is compelling evidence that all existing coal loading capacity has been optimised (including competitor operations) and that the demand for increased coal export capacity through the Port of Newcastle is genuine. In recent years actual production capacity has fallen below projected levels and it is well known that operations make optimistic best case forward estimates of production levels as a contingency.



There is genuine community concern about contamination, especially particulate material, resulting from storage and handling of coal at the export terminal. Wetting down stockpiles is at best a limited measure to prevent losses from stockpiles. Are the existing Newcastle operations meeting and ideally exceeding the best possible standards for coal storage and handling given their location in a population centre and the increasingly erratic climatic conditions the Hunter Region experiences (i.e. severe storms involving near cyclonic force winds on occasions)? Has the amount of coal contained in stockpiles been minimised to that necessary for "just in time delivery", or are the heaps larger than necessary because they are convenient buffer storage? In similar urbanised situations metallurgical smelters have been required during recent decades to store metallurgical raw materials in covered buildings and to cap residue stockpiles; is there a case for similar standards to be required for coal stockpiles? If increased export capacity means increased stockpiled material, which is a logical conclusion, any increase in capacity would have a cumulative impact on the amount of particulate material released into the local environment. This is unacceptable and can only be prevented if improved measures to prevent particulate losses are implemented. If the export of coal is so economically important to NSW and Australia, then it must be able to support the incremental production cost associated with protection and preservation of our unique environment and the best possible safeguards for the health of the people of Newcastle.

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