

Mr Andrew Rode  
Senior Environmental Assessment Officer  
Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Mr Rode

**RE: Tahmoor South Coal Project (SSD 8445)**

Thank you for the opportunity to review the Environmental Impact Statement (EIS) for the Tahmoor South Coal Project. South Western Sydney Local Health District (SWSLHD) has focused its response to matters directly related to health; identifying potential health impacts as a result air pollution, noise and changes in water quality.

It is noted that this proposal is an extension to an existing underground mine which has been operating since the 1970s. The proposal would continue to access existing facilities with some additional surface infrastructure upgrades. We note that there are established monitoring processes in place that will continue and be scaled up for the construction phase with mitigation measures proposed for air pollution, noise pollution and water quality. Whilst these factors suggest the risk to the health of the community is unlikely to increase significantly with the current proposal, the EIS notes exceedances to air and noise pollution standards without a reliable way of assessing the current and future health impacts.

It is therefore suggested that a more detailed health impact is included as part of the EIS, preferably through the implementation of a formal Health Impact Assessment (HIA). Whilst the Social Impact Assessment includes a section on 'Health and Wellbeing', it is not comprehensive enough. HIAs are used to systematically identify and assess health impacts of an activity and would provide more detail about the health impacts of both current and future mining activity.

Further details on the major areas concerning health are described below:

**Air pollution**

The effect of construction of two mine ventilation shafts has the potential to result in dust deposition, visible dust plumes and elevated PM<sub>10</sub> concentrations. These impacts are stated to be short term and temporary in nature. The worst case scenario indicates that PM<sub>10</sub> concentration is likely to be exceeded for between one and nine days a year for a single monitoring site. It is stated in the EIS that 'incorporation of the TARP and other dust management practices, [that] these exceedances would be well managed', however, it is not possible from the EIS to estimate the likely health impacts on any residents nearby. The proposal includes ongoing monitoring of air quality and odour and mitigation measures such as the Construction Air Quality Management Plan.

**Noise pollution**

Noise from the existing Tahmoor mount was found to be above the Project-specific noise levels at a number of locations but the levels are predicted to reduce for most receptors

South Western Sydney Local Health District acknowledges the traditional owners of the land.

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during the day and evening periods. Mitigation measures and monitoring are included in the plan. It is again not possible from the EIS to assess what the impact from these noise exceedances are for the health of residents.

Construction noise is predicted to be below the sleep disturbance screening criteria at all nearby assessment locations. Two properties affected by construction noise levels outside of standard hours are being negotiated for the purpose of acquisition. The EIA states that 'Tahmoor Coal will continue to monitor and actively manage construction noise and vibration as part of the proposal'.

### **Water quality**

Additional water quality impacts due to releases and overflows from the site water management system are likely to be low. Any impacts to private bore users (groundwater quality or quantity) would be subject to make good provisions by Tahmoor Coal. Surface water monitoring of quality will continue during mining, with remediation measures and post-mining monitoring programs in place.

### **Social Impact**

A social impact statement is included in the EIS, which concludes that the social impacts of the proposed development are likely to be generally consistent with those of the existing operations at Tahmoor Mine. However, the Health and Wellbeing section within the SIA report (3.2.2 page 41) is not very comprehensive.

Should you require any further information please contact Dr Naru Pal, Director, Public Health Unit, South Western Sydney Local Health District on 8778 0820.

Regards



**Stephen Conaty**  
Director, Population Health

Date: 26/2/15