

RE: NorthConnex (M1-M2) Project – Modification

Application No: SSI-6136-MOD-3

Statement

I strongly object to the proposal to modify the approved Volatile Organic Compound (VOC) limit, by increasing the limit from 1mg/m³ to 4mg/m³.

Reasons

1. The proposed modification places **no time limit for the allowance of the increase of VOC**. This effectively means 4mg/m³ will be allowable for an indefinite period of time. This is not acceptable.
2. Increasing the levels of VOC will lead to **increased and unacceptable levels of air pollution and odour pollution** in the vicinity of the ventilation outlet and surrounding areas.
3. Increasing the levels of VOC poses a **significant and unacceptable health risk for residents**.

VOC levels of <0.3mg/m³ to 0.5mg/m³ are considered low or acceptable
VOC levels of 0.5mg/m³ to 1mg/m³ are considered marginal
1mg/m³ to 3mg/m³ is considered **high**

The proposed modification would increase VOC to even more than a 'high' level. This level of exposure is unacceptable for members of the public.
4. **VOC of ventilation outlets in other Sydney tunnels are nowhere near as high as 4mg/m³ on an indefinite basis**. For example, Lane Cove tunnel - The NSW Planning minister's conditions of approval (MCoA) for the Lane Cove tunnel are VOC of 1.6mg/m³ (west stack) and 1.2mg/m³ (east stack). Under no circumstances is VOC of double to almost triple this amount acceptable for the NorthConnex project.
5. If VOC limits are allowed to be increased fourfold, Roads and Maritime Services and the Department of Planning, Industry and Environment will be **breaching the Universal Declaration of Human Rights** by allowing citizens of Sydney to be exposed to concentrated carcinogenic fumes of diesel, despite the Government knowing the dangers. In June 2012, the World Health

Organisation (WHO) declared diesel fumes to be a level -1 Human Carcinogen, i.e. proven evidence of carcinogenicity in humans.

6. The preamble to the **World Health Organisation's constitution declares that it is a fundamental human right of every human to enjoy "the highest attainable standard of health"** The United Nations also defines our right to health in Article 12 of the International Covenant on Economic, Social and Cultural Rights in 1966. It guarantees the "right of everyone to the enjoyment of the highest attainable standard of health" through "the **prevention and reduction of the population's exposure to harmful substances** such as radiation and harmful chemicals or other detrimental environmental conditions that directly or indirectly impact upon human health" (Article 12.2 (b))
7. Through ratification of international human rights treaties, Governments undertake to put into place domestic measures and legislation compatible with their treaty obligations and duties. **If the health of the citizens of Sydney, including myself and my family is directly or indirectly affected by emissions from the NorthConnex ventilation outlet, the Australian Government will be liable for any and all associated costs**, including but not limited to health and medical costs.
8. If the proposed modification is approved, the **Government is responsible for taking appropriate measures to ensure the safety of the population.** These measures include, but are not limited to the following:
 - **Installing at least a further 10 to 20 air quality monitoring stations** in more locations to ensure air quality goals are satisfied. Currently there are only two, which is not enough for a 9km long tunnel located in such a highly dense residential area. The Lane Cove tunnel, which is only 3.6km in length has 7 external air quality monitoring stations and yet it's two outlets are both in industrial areas.
 - **In tunnel filtration and/or ventilation outlet filtration is required** and should be included as an essential part of approval for any modification, as per the Legislative Council Public Accountability Committee Report on the Impact of WestConnex Project, Recommendation 13 **"That the NSW Government install, on all current and future motorway tunnels, filtration systems in order to reduce the level of pollutants emitted from ventilation stacks."**
 - Conditional approval only being given, with a **requirement to increase the height of the ventilation outlet** to offset the requested increase in VOC. The M5 East tunnel is 10km in length and the ventilation outlet is 35m, yet the NorthConnex ventilation outlet for a tunnel of similar length is less than 30m.

This is clearly a discrepancy. A request to quadruple VOC will require a significant increase in stack height and the height of the NorthConnex outlet should be increased to at least 35m.

- **Any increase of VOC over and above 1mg/m³ must be limited** to less than 1hour/day or a total combination of 7hrs/week.
- **A new Environmental Impact Statement is required** prior to any increase in VOC being approved, as approval for the ventilation outlet was based on the figure of 1mg/m³. If a new EIS is not done, then approval for the entire project becomes void and a new application must be submitted for the project to continue.