



Hunter Environment Lobby Inc.

PO Box 188
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Controlling Air Pollution in New South Wales

Hunter Environment Lobby Inc. (HEL) is a regional community-based environmental organisation that has been active for over 20 years on the issues of environmental degradation, species and habitat loss, and climate change.

HEL is pleased to be able to comment on the Consultation Paper on reducing air pollution and our points are listed below. We particularly commend the Minister in the release of this document, it is comprehensive and has a multi layered approach, but there are many deficits.

As an organisation based in the Hunter, we are particularly interested in the Hunter and Upper Hunter issues examined in detail in the document. However, we note that to be effective, many State Government Departments need to be working together in a whole of government approach. There is no evidence of this in the document.

As an example, we note that air pollution in NSW is severe. Each year, in the Greater Sydney region alone, air pollution causes 520 premature deaths, 6300 cumulative years of life lost, 1180 hospital admissions and an estimated \$6.4 billion in health costs. And it's expected to get worse. Particle pollution (PM10) in NSW is expected to increase by 65% over the next 30 years.

We note that 90% of Hunter Region PM10 pollution is caused by open cut coal mines and has trebled over the past 10 years.

Also we note that the impacts of air pollution are unfairly distributed. Community health is especially impacted in those parts of NSW where coal is mined or burned to generate electricity, as in our area.

HEL has had representation on the Upper Hunter Air Quality Monitoring Network Advisory Committee. We recognise that the implementation of this network has been a major improvement in the measurement of regional air pollution in the Hunter Region.

However, we are concerned that the network generates regular alerts of exceedances of the national standard for PM10, with no apparent management response.

Since October 2016 there have been 64 air quality alerts in the Upper Hunter including a sulfur dioxide alert in Muswellbrook on 23 December 2016.

There is no evidence that the EPA investigates the source of these air pollution events to prevent health impacts in the region.

An effective air pollution control strategy must be based on objectives that are measured (eg a 50% reduction in emissions from coal mines by 2020), actions that are monitored, and meaningful community involvement.

Similarly, in Sydney where houses are close to motorways and road tunnels, and in regions where people burn wood to heat their homes, community health is suffering. We feel that the Consultation Paper offers no real measures to control these major sources of air pollution.

As a point of explanation, HEL has been writing submissions to new and expanding coal mines in the Hunter for the duration of our existence. We have yet to see any sign that cumulative impacts in a region of coal mining on air pollution, community health or environmental sustainability hold any sway as an argument against increasing either the destruction of native woodlands, rich alluvial plains or a particular landscape to a depth of say three hundred metres.

Until cumulative impacts are recognised, we feel our arguments have an unnatural bias against them by various government departments.

HEL submitted a substantive submission to the Load-based Licencing (LBL) Scheme Review. We consider that the expansion of the assessable pollutants schedule to include particle pollution, heavy metals and toxic emissions produced by coal mining and power generation will help to achieve the Clean Air goals.

The LbL Scheme should include adequate load based fees to encourage pollution reduction. Polluter pays rather than community health pays is a better method for managing air quality.

The Hunter Region should be a critical zone under the LbL Scheme. The issue of growing vehicle population in cities as another example, where government policies are said to have an influence as this Consultation Paper asserts, we find the Transport Department's power is taken away from it by the Planning Department.

Witness the cutting of the rail line into Newcastle, which now sees over a third of extra vehicles daily driving into Newcastle and surrounding suburbs because commuters who regularly used the fast and seamless rail transport into Wickham, Civic and Newcastle now have to add up to an hour on to their busy schedules and change modes of transport to access their goal, whether work, recreation or appointments.

Our interest in climate change is pivotal to the health of the local environment, as well as the health of our community. As a natural corollary to this, minimising CO2 emissions from burning coal is one of our *raison d'être* – and we see that with government bodies working correctly together, replacing coal generation with renewables is the jobs rich sensible way to go.

This policy fits neatly with your goal of minimising emissions from coal mining.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Jan Davis', is written over a faint, light-colored background that looks like a document or a stamp.

Jan Davis
President