

To: LBL.Review@epa.nsw.gov.au

Load based licencing review.

I would like to have input into your review of this scheme, especially in the area well known to me, of coalmining.

It is incongruous that it currently is deemed to have no 'assessable pollutants' under the load based licencing scheme schedule for coal mining.

What it emits into the air and water of the Hunter Valley for example is not only visible, and tangibly adversely impacting on residents, as regional health reports show, but measured and reported by the National Pollutant Index regularly. Other industries must pay for such pollution; so should coal.

Our taxes pay the health bills it causes with the Hunter's above state average incidences of and early deaths from cardiac and respiratory illnesses especially. It is surely only fair that the polluter not only does all possible to reduce the pollution, but that they pay under this scheme for what they emit.

For air pollution, this industry is the acknowledged largest contributor to NSW's particulate pollution, and a major one for airborne volatile organic compounds. PM<sub>10</sub>, PM<sub>2.5</sub>, VOCs, arsenic, PAHs and NOX should be listed as assessable air pollutants for coal mining.

For water pollution, it is the largest contributor of arsenic, selenium and Chromium III, and with lead, these should should be listed as assessable water pollutants for coal mining.

The Hunter between and around Singleton and Muswellbrook has suffered and been ignored for too long as far as coal pollution goes; the EPA must manage it as a critical zone under the load-based licencing scheme. It must ensure national standards are being met, which will require a 50% reduction in particle pollution there (as noted by the EPA), regardless of production targets or needs. Human health is more important.

Australia is way behind the world in including PM<sub>2.5</sub>, for which there is no known safe levels, and this must be added to the load-based licencing scheme as an assessable pollutant for coal mining, petroleum exploration and production and electricity generation.

Fees for the scheme should be increased so that:

- the cost for polluting is greater than the cost of pollution abatement, and
- the cost imposed on pollution internalises the cost burden that pollution imposes on the public.

I also think that, given the urgent need to reduce carbon and methane emissions, these should be considered for inclusion as assessable pollutants for electricity generation, coal mining and petroleum exploration and production, and the fee rate set accordingly.

I urge you to bring coal into the scheme.

Thank you.

Sharyn Munro

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