Minimise Non-Road Diesel Emissions

This action refers to the EPA’s *Diesel and Marine Emissions Management Strategy* of 2015. It should be noted that, since the release of the *Strategy*, the International Maritime Organisation (IMO) has confirmed that the fuel sulphur limit for commercial shipping will reduce from 3.5% to 0.5% from 1 January 2020. This will achieve a significant improvement in air emissions from shipping worldwide. NSW Ports has consistently argued that shipping is an international industry that is best regulated through IMO processes. Now that the IMO has agreed to proceed with further regulation of sulphur in fuel, it is no longer necessary for the NSW Government to set its own limits which were likely to be inconsistent with international requirements and impose unnecessary cost and technical complexity on the shipping industry.

We note that it is proposed to “develop targeted diesel emissions measures” for the infrastructure sector. NSW Ports would welcome an opportunity to liaise with EPA on appropriate measures to reduce emissions from diesel-powered plant and equipment utilised in ports provided that the measures meet the following criteria:

- Developed in consultation with industry
- Evidence–based to achieve a significant benefit in terms of air quality and human health outcomes
- Phased in over a reasonable timeframe to allow industry to adapt to the requirements with minimal disruption
- Feasible to implement with available technologies and at a reasonable cost
- Applied on a state-wide basis to the whole freight and logistics sector so as not to disadvantage any operator on the basis of location.

Air Quality Monitoring Review

NSW Ports supports appropriate alignment and integration of industry self-monitoring with government-funded regional air quality monitoring to ensure that monitoring effort is efficient, targeted and cost-effective. In recent years there has been increasing adoption of real-time monitoring methods as a management tool for industry. To assist with the interpretation of real-time monitoring data from industry, it would be helpful if the OEH regional PM10 and PM2.5 data could be made available in short-term average values (i.e. 15 minute or 1hr averages) via the OEH website.
Planning for Clean Air as Sydney Grows

NSW Ports strongly supports measures to ensure that air quality impacts are considered in land use planning, particularly measures to avoid land-use conflicts. When identifying “strategic centres” which require specific planning controls, government should include major freight corridors as well as ports and freight handling nodes (including present and future intermodal terminals). For further details regarding appropriate planning controls around ports, intermodals and freight corridors, refer to Navigating the Future: NSW Ports’ 30 Year Master Plan (http://www.nswports.com.au/publications/).

Clean Transport for Clean Air

In addition to the transport improvement identified in this section of the discussion paper, NSW Ports also supports the further development of freight rail infrastructure and a network of intermodal terminals across Sydney to efficiently cater for future growth in trade and freight volumes. Requirements for improvement of freight handling infrastructure are specifically identified Navigating the Future: NSW Ports’ 30 Year Master Plan. NSW Ports seeks further commitment from Government to deliver appropriate freight infrastructure in a timely and efficient manner.