Dear EPA and Minister Speakman,

This submission is made by Ryde Community Alliance which is a community based environment group which formed to advocate for strong and robust environmental planning laws for NSW and to oppose the NSW Government's weakening of existing planning laws, in the interests of the people of NSW and the environment.

The NSW Government must act to improve air quality and protect the health of the community, without delay, to prevent ever more citizens from being exposed to high levels of dangerous pollutants from diesel fuels, coal mining, coal fired power stations and wood burning stoves.

1. The Alliance expects a strong air pollution control strategy for NSW that will reduce pollution levels to the lowest level possible, not to just below the national standards. The evidence is in that the national standards are in need if urgent upgrade. Due to extreme heat in the Sydney region in the last seven days a warning was issued for higher than normal ozone levels. What will the draft strategy do to reduce these events?

There are significant health benefits in reducing pollution concentrations to well below the national standards. The groups Doctors Against Polluting Stacks has informed the public of the risks to health. No government can sit on its hands as the health and wellbeing of the people declines, can it? An effective air pollution control strategy must be based on objectives that are measured (e.g. a 50% reduction in emissions from coal mines by 2020), actions that are monitored, and meaningful community involvement.

2. Tackle air pollution from power stations.

Our five largest coal-fired power stations emit huge quantities of fine particle (PM2.5) pollution, sulphur dioxide, oxides of nitrogen and a wide range of toxic pollutants. Many countries have successfully switched to renewable energy so it is time that the NSW Government sought expert advice from scientists and economists to flick the switch to renewables. This transition requires government support to get it off the ground and take advantage of the economic opportunities which will ultimately benefit every community. Meantime coal-fired power stations must be required to implement all available measures to control air pollution.

3. Control air pollution from coal mines.

In the Hunter and other coal-mining regions, open cut coal mines are responsible for about 90% of coarse particle pollution, which have doubled in the last five years and trebled in the last ten. It is appalling that the consultation Paper proposes no significant new measures to tackle these emissions. The Dust Stop program which aims to reduce coal dust by 80% isn’t working. What is the NSW Government doing about that?
The application of the principles of ecologically sustainable development require that no new or expanded coal mines should be approved where pollution levels potentially exceed the national standards. Existing coal mines need to be much more actively regulated to control coal dust and to mitigate other impacts. But it seems the Department of Planning & Environment will approve any development. This dangerous practise places ever more people at risk of numerous serious diseases for which the State will ultimately be held responsible.

4. Cover coal wagons and mitigate pollution.

Each year, millions of uncovered coal wagons pass through residential areas throughout NSW. Independent studies have demonstrated that particle concentrations increase significantly as these wagons pass. Covering wagons can reduce coal dust emissions by 99%. The Government must require all coal wagons be covered. Conditions of consent must specify the stringent controls required to halt pollution.

5. Scrap dirty wood heaters.

Wood heaters are responsible for 47% of Sydney’s fine particle (PM2.5) pollution each year; up to 75% in July. This is a very high priority for controlling air pollution and one of the most cost effective options. A small incentive would support residents to replace their polluting wood heaters with clean, efficient heaters. Incentives for home insulation would reduce the need for heating. Ryde Council continues to approve wood heaters. What measures will be introduced to improve existing heaters and mitigate the adverse impacts?

6. Polluters must pay.

Air pollution costs the people of NSW dearly, with the most polluted communities carrying an unfair share of this burden. By requiring polluters to pay, the NSW Government can create incentives for cleaner production. Load-based licencing fees paid by major polluters should be significantly increased. An analysis by Doctors for the Environment Australia recommends increasing fees to 50 times the current rate, so that polluters pay for their health impacts. Load-based licencing fees should also be paid by coal mining companies who are currently exempt.

It would be appreciated if this submission on behalf of the Alliance could be properly considered by the NSW Government in determining the actions required in order to address the worsening air pollution impacting on all of communities.

Yours sincerely,

for Ryde Community Alliance.

Kind regards,

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