Submissions

Name withheld

- The meaning and rationale for the use of the term ‘average’ air quality needs to be explained clearly. The term sounds generic and vague. Referring to average air quality in terms of a numerical value or values would hold the policy to account.

- The policy would be strengthened by articulating its relationship with and implications for the government’s planning instruments, specifically, local environment plans (LEPs) and development control plans (DCPs).

- The plan would be strengthened by identifying local initiatives to assess the plan’s progress and success and to help improve air quality. For example, the Newcastle City Council’s award winning Climate Cam initiative measured the city’s progress in reducing energy consumption; and re-forestation and use of architectural vegetated green walls can improve air quality.

- The term ‘shared responsibility’ needs to be defined.

Name withheld

This is a generally very good document that, if all of the actions are initiated and a policy formulated around them, will prove to be of huge environmental benefit. Kudos to the authors.

Page 8

- “improved air quality”, omit the word average.

Page 10

- There is no need for the word "average" as it will confuse the issue.
- Of "life expectancy" perhaps?
This is a great set of aspirations but there is a theme throughout of "investigations" and "considering policies" where the public would like to see more definitive and concise measures described. I understand a lot is subject to the investigations but the tone is a little ambiguous and non-committal.

Page 28

- Good review to have in play but will the changes be retrospective for all potential polluters? Incentives not to pollute are great but there needs to be a clear message that pollution reduction is a "must", not a "should if you choose to do so" requirement.
- If the "incentive" to pollute (profit/bottom line increase) is high enough then this methodology falls short of its objectives.

Page 29

- "Must", "will" or at the least, "should" develop a policy

Page 46

- LGA's are more than happy to be involved and even help regulate and enforce policy but they will require funding, especially poorer, regional and rural councils. This must NOT be a cost-shifting exercise by the State Government.

Name withheld
A very comprehensive document
Page 24.- Misspelling of “Beresfield”

John Krey - Community Representative

Introduction page 8

- The introduction on page 8 states the evidence tells us that the greatest public health gains will come from reducing long-term exposure of large populations to air pollution. The concerns of Hunter Valley residents are also for smaller population areas that these also should be protected from air pollution.

Page 10.

- I understand that the terms ‘feasible and cost effective’ and also ‘effective feasible actions’ are terms used in the current suite of policy guidelines for the assessment process. However, as these terms have been defined these are generally used as reasons why proper protection against health damaging air pollution is not implemented. Generally this comes from industry who maintain that any further controls or measures to improve air quality will generally be too expensive and a financial burden on their industry.
Page 10 states as ‘there is no safe threshold for exposure to fine particles continued reductions and exposure can reduce adverse symptoms, need for medication, visits to doctors and emergency departments, hospital admissions and premature deaths across cities and communities’. On that same page last paragraph states ‘Proposals under the Clean Air Act for New South Wales will be subject to rigorous cost benefit analysis’. I refer to my previous paragraph.

Page 17.
- It is important to note under air quality data that health effects are known to appear even at concentrations that are within the national standards. This needs to be reinforced and air polluters reminded that whilst they may be operating within the national standards their pollution may still be causing health effects.

Page 20
- Figure 5. Top direct human made sources of PM$_{2.5}$ emissions notes coal mining as the biggest in emitter for 2012. I also note elsewhere in the documents and EPA announcements that the amount of pollution in the Hunter Valley tends to rise and fall with the level of open-cut mining in this valley.
- I propose therefore that organisations such as the Upper Hunter Air Quality Advisory Committee and the EPA should resolve to recommend limiting or stopping any further expansion of open cut coal mining in the Hunter Valley.

Page 29. Strengthening the Mining Rehabilitation Framework.
- The first sentence under ‘Action’ where it states ‘the New South Wales government ‘could’ develop the policy and updated rehabilitation framework…..” This should read ‘the New South Wales government must develop a policy including Post Mining final land use including voids.

Page 33. ‘Minimise non-road diesel emissions’
- The second paragraph under ‘Minimise non-road diesel emissions’ notes ‘There is mounting evidence of the adverse health impacts of diesel emissions and growing community concern’ and the air pollution from non-road diesel vehicles is continuing to increase.
- To communities who live near open cut mines diesel fumes from non-road vehicles are a major concern and is generally down played by the mining industry to the extent that in recent environmental impact statements diesel fumes are stated to have no impact on air quality or health. This is the very important aspect of clean air policy and requires urgent attention.

Page 38 ‘Air Quality Forecasting’
- Noted under the second dot point under ‘Action’ that OEH and EPA continue to collaborate to develop an air quality forecasting system for the Upper Hunter to support actions by mines to reduce dust from operations in adverse weather
conditions. The section ‘adverse weather conditions’ should be deleted and the collaboration should be looking to forecast weather conditions to reduce dust in any weather conditions.

**Generally**

- Whilst the report endeavours to cover many areas it is seemingly concentrates on the large population areas possibly at the expense of smaller population areas. This needs to be addressed.