

From: James Whelan <james@thechangeagency.org>
To: <david.mooney@planning.nsw.gov.au>
Date: 20/12/2012 9:38 am
Subject: Objection to Drayton South Coal Project Application Number: 11_0062
Attachments: drayton south dust mitigation measures.pdf

Good morning Mr Mooney

I write to object to the proposed Drayton South Coal Project. The proposed mine would contribute directly to elevated levels of particle pollution (PM10 and PM2.5). EPA monitoring in the vicinity of Muswellbrook routinely records PM10 levels between 40-50ugm-3. This level of particle pollution is already impacting adversely on community health in the Muswellbrook community. This standard was not adopted by the Commonwealth and state governments in order to facilitate approval of developments until this level of pollution is reached routinely, nor to guide the creation of 'sacrificial zones' where levels exceeding twice this level will be allowed. On the contrary, the intention of the NEPM is to maintain levels well below 50ugm-3 in order to protect community health.

Estimates of the proposed mine's contribution to ambient PM2.5 levels are interpreted against the NSW 'advisory reporting standard' of 25ugm-3 over 24 hours. It is important to note that the World Health Organisation recommended in 2005 three interim standards (or goals) for PM2.5. The most stringent of these is 15ugm-3 over 24 hours. This standard is appropriate in NSW (and Australia) as we are a developed nation. Hunter Valley communities expect a precautionary approach to air quality management. Adopting this stricter recommended standard would result in a very different assessment of the mine's impacts and necessary mitigation measures. The Senate Inquiry into health impacts of air quality and the National Action Plan on air quality are likely to move Australia closer to harmonisation with WHO recommended standards. It would be unwise to approve a coal mine that will routinely exceed these standards.

Anglo American Metallurgical Coal propose very few air pollution mitigation measures. Having acknowledged the Donnelly et al 2011 report to the NSW EPA on Best Practice measures to prevent or minimise particulate emissions from coal mining, the proponents commit to 17 of 74 best practice mitigation measures (see Air Quality and Greenhouse Gas Impact Assessment Section 6, pages 35-36 - attached). In several instances, the proponent notes that these measures are being only partially implemented. What justification has been provided not to implement all 74 best practice measures?

The NSW Government should be acting decisively to reduce particle pollution in the Hunter Valley. Suspending approvals of new mines including this one until air quality is an appropriate short-term response.

I would appreciate acknowledgement of this submission.

Sincerely

James Whelan

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The Coal Terminal Action Group is an alliance of 17 community groups in Newcastle and the Hunter: Barrington Gloucester Stroud Preservation Alliance; Climate Action Newcastle; Correct Planning and

Consultation for Mayfield Group; Gloucester Residents in Partnership; Green Corridor Coalition; Hunter Bird Observers Club; Hunter Communities Network; Hunter Community Environment Centre; Hunter Environment Lobby; National Parks Association Hunter Branch; Parks and Playground Movement; Rising Tide Newcastle; Singleton Healthy Environment Group; Stockton Community Action Group; Nature Conservation Council; The Wilderness Society; and Tighes Hill Community Group.