

Dr Richard Stiles
Bowenfels Medical Practice
PO Box 431
Lithgow, NSW, 2790

6th February 2013

Response to the Planning Assessment Commission's Review (PAC1) of the Coalpac Consolidation Project (CCP): Main Report

As a local medical practitioner who has progressively become aware and thence concerned about the sub-optimal health issues affecting the Lithgow Government Area – and the relation of these to local environmental exposures – I am heartened to see in the PAC1's report that these issues have been offered protective weight, which I think any community deserves from its authorities when it comes to foundational quality of life issues such as health.

Firstly, I would like to commend the Commissioners of the PAC1 - Dr Neil Shepherd AM, Garry Payne AM & Joe Woodward PSM. They have covered an enormous amount of information in coming to their report – from numerous agencies across many fields of interest. In doing so in a thoughtful and thorough manner they have demonstrated they have well 'got their heads around' the complexities of Coalpac's EA – and thus can offer a stronger claim that their deliberations informatively weight the private vs. public interests, and the competing public interests, at stake in this case.

I would also like to commend the current Coalition State government on its formation of such a rigorous and more independent assessment process that the PAC's afford. They offer the public a far more inclusive and transparent capacity to contribute to and observe the decisional process for large industrial developments. This is highly desirable given the opaqueness of the previous Part 3A process, where an individual minister was the sole final arbiter of such large decisions – in a way that had very little public input or scrutiny. Yes, the PAC process is laborious – but given the significance of the impacts of some of the determinations under question, I think the value of involving the broader public is significant – as demonstrated by the large amount of correcting information that the PAC was able to access from agencies other than Coalpac in reviewing the CCP EA.

Having written a submission for the PAC1 on Coalpac's EA that proposed a rejection of the CCP across a number of domains, I am of course gratified that this is also the conclusion that the PAC1 has reached. Acknowledging my position thus, I would like to make some comments on the PAC1 report – to which I will mainly confine myself to the human health issues, where my professional expertise lies. Obviously there are other domains that concerned the PAC1 about

the CCP – and these are important in coming to a value weighting of their final position on the proposed project.

The PAC1 correctly noted that the affected local community of Cullen Bullen and surrounds already is documented as bearing a higher-than-average disease burden. A proportion of this burden has a high likelihood of being related to environmental exposures relating to the local industries of mining and burning coal. The submission from NSW Health also corroborated on this inference. There is a growing body of research that supports this conclusion from a variety of coal communities. That is, this is a community that already warrants special considerations, given their above average health burdens. The proposed close proximity of the CCP to the Cullen Bullen township works in the opposite direction – placing them at even more disadvantage.

The issues around dust, noise and vibration impacts are detailed in the PAC1 report. In addition of PM10 data, that is mandated, they propose that the CCP project should also record and publish PM2.5 data. The latter is not yet mandated under regulatory requirements. However the body of medical knowledge on the adverse human health impacts of the smaller PM2.5 particles is growing. I would anticipate it will soon form part of the regulatory requirements, so it is prudent that they be recorded, should the project be approved.

While it is considered in the section on noise, the impacts of the region's temperature inversions are not mentioned in the section on dust issues. This local weather phenomenon is no less relevant for dust issues, as it pushes airborne particles down closer to the ground. It is also one of the concerns for the nearby power stations with their copious particulate emissions, especially sulfur dioxide and nitrate based compounds. The Lithgow power stations stand out in this regard in the National Pollution Inventory. This omission may mean that many of the dust estimates are likely to be understated – especially for the winter months. These are commonly the times when respiratory issues are more prevalent.

It is not in my field of expertise to comment on the technical details of the dust, noise, light and vibration analyses that have been considered. However they all trend towards the same conclusion: Given the CCP will almost surround the Cullen Bullen township and surrounding residences in very close proximity, the impacts from dust, noise, light and vibration abut, and at times exceed, the standard margins of regulatory tolerance for these issues - even on the CCP's EA modeling predictions. Even remaining within these levels will require significant on-going day-by-day decision making and alterations about when and where to blast etc. Given Coalpac's previous corporate compliance record and the realities of the pressures on commercial operations, it is highly likely that the

environmental exposures could exceed those stated in the EA. As the PAC1 notes in its assessment on air quality, “The Commission considers this to be a high-risk situation.” If the CCP were required to meet the NSW National Party’s recommendation that all open-cut mines should be no closer than 5 km to a township then basically none of the project would comply, as it almost completely lies within this.

It is also one of the few times, to my knowledge, that the potential cumulative health impacts from a variety of industrial projects – both current and in-waiting - have been considered. This is only sensible – given how these issues inter-play. The common avoidance of such considerations by limiting terms of reference to narrowly focusing on only one development (or even single steps of staged developments) leads to cynicism that governments are allowing industrial companies means of falsely underplaying the total impact of developments. Again, this PAC is favorably noteworthy in its preparedness to consider such cumulative impacts – which are highly relevant.

This is far from speculative in the case of the CCP. The CCP will be bigger than the existing operations. The Mount Piper Power Station lies only 8 kms down the road to the south – and, as above, has significant emissions. Enhance Place, through its Pinedale Mine and Centennial Coal, through its Neubeck’s Ck extension, will be watching the outcome of the CCP carefully. If Coalpac is approved then this will offer momentum forward for two further open-cut mines just to the south. Already Pinedale Mine’s Yarraboldy extension has been referred to be reviewed federally under the EPBC Act for its environmental impacts. The western Lithgow region thus faces the real prospect of becoming a major open-cut mining area – all in close proximity to multiple human settlements. I, and many others from various other perspectives, would see such a development as highly regressive for the Lithgow region on a number of fronts: human health, environmental heritage, constraining the town’s well-placed capacities to develop other economic streams – such as ecotourism (the benefits of which would penetrate deeper into the community, relying more on locally owned businesses).

Communities can evolve. Strahan in Tasmania is a good example. Whereas it once derived most of its economic base from forestry logging, this now has substantively shifted. With the protection of the natural heritage that came in the wake of the decision not to allow the damming of the Franklin River, a whole range of tourism activities has arisen for the town. It has far from died out.

Thus Coalpac’s dire threats of serious job losses need to be seen in this light. Even on their analysis, only 3% of the jobs in its mines are undertaken by local residents. There is no reason why the other 97% of ‘drive in – drive out’ miners cannot find jobs in other regional mining activities or other related areas that can

use their expertise. What Coalpac has not stated is that the jobs it is creating through its mining operations are suppressing other jobs that could develop should it not proceed. Thus this 'jobs vs. the environment or health' is a false dichotomy. Moreover these other economic streams have the potential to far out live the 21 years that Coalpac will need to extract the remaining low quality coal from the local landscape.

The people of Lithgow have paid with their health to secure the benefits that coal has brought – and this through mainly underground mining. Adding to this health burden by allowing large scale open cut mining to develop along the western fringe of Lithgow will only add to these health disparities. The local politicians have traditionally tried to play down these costs of mining. However Lithgow is evolving and the people are increasingly showing public interest and concern in these health issues – and a new cohort of recently elected local councilors are showing that they are more responsive to these concerns. The CCP is a slap in the face of health concerns for the surrounding residents – its proximity and extent almost striking at hubris from Coalpac.

I hope that the government and the PAC2 will take the recommendations of the PAC1 seriously. I hope that in rejecting the CCP, the government will be showing industries with high social and environmental impacts that they cannot just tread over local issues with impunity. The balance of consent, in my view, has to date been weighed in a polarised way in favour of the developers – with other values being under-played in terms of the 'value accounting' that inevitably needs to take place.

The PAC1's recommendation to reject the CCP is a notable counterpoint to this rubber-stamping tradition. The PAC1 review of the CCP has demonstrated a capacity to see that direct monetary interests need not automatically trump other values. It is important to weigh up all the competing issues for such large projects. For the CCP these other values include human health and other social amenities, environmental heritage, educational opportunities (the Cullen Bullen public school has a high probability of closing should the project go ahead), and adverse impacts on other forms of (less destructive) economic development. These competing issues amount to a strong counter case against CCP – the cumulative consideration of which rightly has led to a conclusion that it would not be in the public interest for it to proceed.

I thus would like to endorse the PAC1's conclusion that the CCP be rejected in total, and the comprehensive manner in which they have arrived at this conclusion.

Thank you for the opportunity to comment on the PAC1's report for the CCP.

