



CLIMATE AND
HEALTH
ALLIANCE

Recommendations for action

Coal and health in the Hunter:
Lessons from one valley for the world



Background to these Recommendations

These recommendations have been produced by the Climate and Health Alliance (CAHA) to accompany the report *Coal and health in the Hunter Valley: Lessons from one valley for the world*. These recommendations and the report have been produced as part of CAHA's advocacy for the protection and promotion of health from the impacts of climate change and environmental degradation. The health implications of energy policy are a key concern for CAHA and highlighting the risks to health from energy choices a core element of its work.

These recommendations are aimed at those involved in public policy development in relation to coal – including policy makers, policy analysts, politicians, energy specialists, researchers, community advocates, health professionals, as well as media.

About the Climate and Health Alliance

The Climate and Health Alliance (CAHA) is a not for profit organisation dedicated to protecting and promoting health from the adverse health impacts of climate change and environmental degradation, and promoting sustainable healthcare. Its members include health professional organisations representing doctors, nurses and midwives, psychologists, physiotherapists, social workers, rural and remote nurses and allied health professionals, as well as healthcare service providers, academic institutions, primary healthcare services, health consumers, and individual health professionals. CAHA is the Australian affiliate of the international not-for-profit organisation, Health Care Without Harm.

Brief Executive Summary

The rapid expansion of the coal industry in the Hunter Valley is out of step with the global requirement to reduce greenhouse gas emissions, and is leading to increasing concerns about adverse impacts on local communities and the state's economy.

The production of coal is one of the most greenhouse gas intensive activities in the world, and is one of the main drivers of climate change – considered the biggest threat to global public health.

Coal production also poses serious risks to the health of local communities, as well as causing substantial environmental damage – both of which incur substantial economic costs.

The impacts on local communities in the Hunter Valley include exposure to harmful air, noise and water pollution, distress associated with social disruption, and a sense of abandonment as government's prioritise the interests of the coal industry above that of the

community. Government regulations are failing to protect the community and the Hunter Valley's natural assets from the negative impacts of the region's intensive coal mining and coal combustion industries.

Recommendations for Action

1. The prohibition of any new coal projects in the Hunter Valley

Rationale: The total cumulative local, regional and global effects of the coal industry on health and wellbeing of humans and other species now outweigh the benefits of this industry to society. It is time to stop expanding this industry and begin to transition the economy to one powered by renewable energy, complemented by increased energy efficiency, and an overall reduction in demand for energy.

Solution: The NSW Government should not approve any further coal developments.

Inclusions: This needs to occur within a broad national approach to a 21st century energy policy and reflect Australia's obligations to contribute to the international effort to limit greenhouse gas emissions.

2. Develop a long term social and economic transition plan for the Hunter Valley

Rationale: Coal is a sunset industry and will not be viable in the Hunter Valley in the longer term. The Hunter Valley community has been obliged to sacrifice environmental value, clean air, and visual amenity to an industry that will not continue to sustain the iconic Hunter Valley in coming decades.

Solution: The NSW Government should work with the Hunter Valley community and alternative industries to develop a regional plan that will help the region transition away from coal and its support industries, and which deliver long term environmental, economic, and social benefits and sustainability.

Inclusions: Participatory consultation should occur with the community, local governments, existing industries and other industries with potential for development in the Hunter Valley, including the renewable energy sector, tourism and farming.

3. Assessments of current impacts and ongoing risks from existing coal projects in the Hunter Valley

a. Health impact assessment of all coal projects

Rationale: State government processes for the assessment of coal projects in NSW have failed to account for the implications for human health in determining the risks and value of each project.

Solution: To prevent any further harm, and establish the health risks posed by existing coal projects, the NSW Government must require comprehensive Health Impact Assessment to be conducted on all coal projects.

Inclusions: This must include a cumulative assessment of the health effects of each project on workers and the local community as well as the impacts on people in countries to which coal is exported. Evaluation should include potential psycho-social and physiological health risks associated with: solastalgia, displacement, social conflict, reduced quality of life, as well as symptoms, hospitalisation, illness and deaths attributable to the project. Health Impact Assessments must be conducted and reviewed by independent, qualified health professionals with specific expertise in HIA. Consultation with affected communities must be an integral part of the Health Impact Assessment. HIA methods and results must be publicly reported.

b. An independent health research program to evaluate the short, medium and long term health impacts of coal in the Hunter Valley

Rationale: Communities in the Hunter Valley are concerned about the health impacts of the coal industry and have been calling for research projects to evaluate risks to health for some years; however no comprehensive health research has been undertaken.

Solution: The complexity of the health risks from coal requires a multidisciplinary approach to research (including epidemiology, toxicology, and sociology) in order to identify threats, exposures and vulnerabilities. Research should seek to identify both the burden of disease at individual and community levels. It should commence as soon as practicable and continue for at least two decades.

Inclusions: For the research project/s to be effective, it/they should be collaborative and participatory in nature i.e. co-designed with the community to boost engagement of the local populations and ensure the outcomes address community concerns.

c. All coal mines to develop plans to prevent and suppress mine fires

Rationale: Open cut coal mines in the Hunter Valley face serious and increasing threats from bushfires. The Hazelwood mine fire in Victoria has demonstrated the potential for serious risks to communities when fire prevention and management plans at coal mines are inadequate.

Solution: NSW Planning to require all coal projects to submit annual work plans that specifically address fire prevention, mitigation and suppression measures.

Inclusions: The NSW Government must monitor and enforce compliance of fire risk measures

d. Assessment of impacts of HV coal on economy and society: greenhouse gas emissions, loss of natural capital and the social cost of carbon

Rationale: The ongoing development of coal projects at a time that the world should be dramatically cutting carbon emissions is inconsistent with the scientific evidence of harm from climate change and the carbon intensive global economy – an urgent threat to all human populations as well as other species. These costs, and the economic costs associated with harm to ecosystems, are not currently being incorporated in cost-benefit assessments of proposed projects.

Solution: Assessment and public disclosure of all the greenhouse gas emissions associated with each coal project in the Hunter Valley to provide transparency with regard to the contribution to global warming.

Inclusions: The economic value of ecosystems must also be considered so that there is a clear understanding of the value of natural capital that may be compromised by coal operations.

4. Implementation of stricter air quality measures to reduce current and future exposure to hazardous air quality

a. Stricter monitoring and compliance regimes, including improved national air quality standards for PM10 and PM2.5

Rationale: Current air quality standards are failing to prevent exposure to unhealthy air pollution. The World Health Organization (WHO) says there is no safe level of exposure to particulates and yet Australia does not have a mandatory standard for PM2.5. Australia's particle pollution standards were set in 1998 and are currently under review.

Solution: The development of enforceable national standards for all major air pollutants, stipulating maximum permitted concentrations, consistent with world's best practice and compliant with World Health Organization guidelines. This could be incorporated in a national Pollution Prevention Act, as recommended

by Environmental Justice Australia. Enforcement mechanisms and a framework to progressively reduce pollution levels could be adopted through the National Clean Air Agreement that is being developed by state and national governments.

Inclusions: Air quality standards must reflect particular risks from point source emissions such as coal fired power stations and coal mining and include monitoring and compliance obligations and enforcement mechanisms, including penalties that create a sufficient deterrent to prevent non-compliance. Air quality monitoring should be expanded to more effectively evaluate the exposure of vulnerable groups and populations living in close proximity to major sources of air pollution, with data publicly available in real time. Data records from daily monitoring of key pollutants to be publicly available online in real time and regular modelling of dispersal from all point sources (e.g. coal facilities) should also be publicly available online.

b. Reduce particulate emissions from coal transport

Rationale: Large populations, including at risk communities, are being exposed to increased levels of particulates from coal transport through the Hunter Valley to the Port of Newcastle.

Solution: Regulations to require coverage of all coal carrying wagons (both empty and loaded) in transit to and from coal mines and coal terminal facilities in line with best practice dust management.

Inclusions: This should include coal wagons transporting coal to coal fired power stations in the region and to export ports.

c. Limits for diesel emissions

Rationale: There are no national regulations that apply to emissions from non road diesel vehicles or diesel locomotives in Australia.

Solution: Mandatory standards to be developed for non-road diesel emissions comparable to world best practice.

This should include expansion of air quality monitoring and reporting as well as health surveillance to more effectively evaluate the exposure of vulnerable groups and populations living in close proximity to major sources of air pollution.

5. Reform of NSW state environmental planning laws

Rationale: Current state environmental planning laws privilege the project proponent and the economy and not the community. The principles of Ecologically Sustainable Development (ESD) in the Environmental Planning and Assessment Act are being ignored in planning decisions, policies and regulations. The rights of communities to appeal planning decisions are being removed. The current arrangement whereby a public hearing by the Planning Assessment Commission extinguishes third party merits appeal rights is unacceptable. The use of consultants paid for by the project proponent to assess environmental impacts leads to conflicts of interest.

Solution: The NSW Mining State Environmental Planning Policy (SEPP) should be amended in order to ensure the principles of Ecologically Sustainable Development, not the 'significance of the resource', applies to all planning and development decisions for coal mines currently in the planning pipeline. Third party merits appeal rights should be restored for all development and infrastructure proposals, and an environmental impacts assessment process established in which project proponents cannot directly choose and employ environmental consultants.

Inclusions: A forum for participatory dialogue established in the Hunter region to allow full community participation in decisions regarding coal production. The potential for environmental, health and social harms must prioritise considerations in the independent assessment of project and infrastructure proposals.

6. Establish a national environmental protection agency

Rationale: The management of environmental policy is occurring in an ad hoc way across different jurisdictions within Australia. No current state or territory biodiversity or planning laws effectively and efficiently protect the environment.

Solution: New comprehensive National Environmental Protection laws, with a National Environmental Protection Agency.

Inclusions: National environmental legislation must ensure decisions are made in the national interest, and not in the short term interests of state and territory budgets. The agency should be imbued with powers to ensure states and territories comply with national environmental laws, investigate breaches, enforce compliance, and penalise failures of compliance.