

**Submission
No 10**

INQUIRY INTO COSTS FOR REMEDIATION OF SITES CONTAINING COAL ASH REPOSITORIES

Organisation: Warners Bay Areas Sustainable Neighbourhood Group

Date Received: 14 February 2020

Director Committees,
Public Work Committee,
Legislative Council NSW Parliament,



Dear Sir or Madam,

Inquiry into Remediation of Sites containing Coal Ash Repositories.

PREPARED BY LYN FRASER
FOR THE WARNERS BAY SUSTAINABLE NEIGHBOURHOODS GROUP
SUBMISSION TO NSW LEGISLATIVE COUNCIL, NSW PARLIAMENT - PUBLIC
WORKS COMMITTEE -
INTO THE COSTS FOR REMEDIATION OF SITES CONTAINING COAL ASH
REPOSITORIES

The Warners Bay Sustainable Neighbourhood Group (WBSNG) appreciates having this opportunity to make a brief submission to the Inquiry into the Costs for Remediation of Sites Containing coal Ash Repositories.

The WBSNG is one of several local area Sustainable Neighbourhood Groups located within the Lake Macquarie City Council. The Sustainable Neighbourhoods program empowers community members to act on local environmental, sustainability and community initiatives.

The WBSNG covers residents and friends of Croudace Bay, Eleebana, Lakelands, Macquarie Hills and Warners Bay. The group holds formal meetings on a monthly basis but also holds several community activities throughout the year as well as supporting the efforts and activities of likeminded organisations and community groups.

The WBSNG notes that residents around the Lake have been increasingly concerned about the unlined coal ash dams of Vales Point Power Station and Eraring Power Station. These two power stations are respectively located in the southern and south western part of Lake Macquarie.

In the past they have provided useful sources of employment opportunities for workers and energy supply for the entire state. But it is now time to prepare for a just transition with jobs and investment in renewable forms of energy which don't create health and environmental problems for regional communities - particularly as these old coal fired power stations are edging closer to the end of their designed lifespan.

The coal ash is residue from the combustion process when coal fired power stations generate electricity. Whilst ash from coal fired power stations is not the sole source of heavy metals in Lake Macquarie, research indicates that it is a contributing factor.

We share the concerns outlined in two the major reports released 2019. '*Unearthing Australia's toxic coal ash legacy*', was published by Environmental Justice Australia (EJA) and '*Out of the Ashes: water pollution and Lake Macquarie's ageing coal-fired power stations*' by the Hunter Community Environment Centre (HCEC). Both of the reports call for regulatory improvements, more stringent licensing provisions as well as improvements in management of the sites and increased monitoring and transparency.



The HCEC report included data from current and previous investigations and research on heavy metal concentrations in the water, sediments and seafood of Lake Macquarie. It is particularly disturbing to find that the dams leach heavy metals such as selenium, zinc, nickel, copper, aluminium, iron, magnesium, cadmium and lead at levels significantly higher than guidelines set by the Australian and New Zealand Environment and Conservation Council (ANZEC). Such pollution can accumulate in the ecosystem and have significant impacts on fish, crabs, birds and the general health of creatures in and around the lake.

Compared to other parts, the southern part of Lake Macquarie had higher levels of selenium found in samples of fish species. In addition higher levels of arsenic were found in Mud Crabs, Sand Whiting and Yellowfin Bream, copper in Silver Trevally and zinc in Sea Mullet. (We note that the Environment Protection Authority has guidelines limiting the consumption of seafood from the lake because of health concerns from toxins.)

Fly ash represents a major component of the coal ash held in the dams. The dams contain a total of approximately 61 million tonnes of coal ash. In addition to the leaching of heavy metals into Lake Macquarie and groundwater, there have been occasions when residents have noticed dry ash being blown across the lake and into communities. These dust clouds of mercury, lead, arsenic and other toxic components have been linked to the emergence of cancer, asthma, respiratory and other diseases.

Several of our members have written to various Members of Parliament and Councillors about the issue. We are now strongly of the view that effort needs to be put into planning an effective clean-up of existing pollution and planning to mitigate against the future threat of contamination of land, groundwater, the lake and other water ways. As the ash dams are unlined, a process of 'remediation' which simply involves covering the top with soil and vegetation will not address problems of long term leaching into ground water and surface water.

Local communities have been affected by the existence of the ash dams for several decades and, as the power stations are close to the end of their designed life, it is time to start planning for closure so that the interests of the local communities and the environment are adequately taken into account when the closure dates arrive.

Unlike most landfill sites, coal fired power stations are not required to provide a financial security for the rehabilitation of coal ash dams. We think this is outrageous. Not only are local communities affected by the pollution from the coal fired power stations but the current arrangement leaves tax payers exposed to footing the bill for a costly clean up!

The WBSNG is in broad agreement with the recommendations put forward by the HCEC and the EJA reports. But we want to draw particular attention to the following:

The government should develop coal ash dam specific Regulations under the Protection of the Environment Operations Act.

The NSW Government should provide public access to all groundwater monitoring data (current and historical) via a website similar in function to the website for air pollution monitoring website maintained by the NSW EPA. Data should be interpreted through reference to current best practice international standards.

We recommend that the government develop best practice guidelines which should be followed in order to facilitate improvements in coal ash dam management, rehabilitation, closure and post closure management.



Regulations should require coal ash operators to prepare comprehensive rehabilitation and closure plans.

The government should require all coal fired power station operators to provide financial assurance to secure or guarantee funding during the operation of the facility and during the post-closure period and until the EPA is satisfied that the site is stable and not polluting.

We thank you again for the opportunity to participate in the Inquiry process.

Kind Regards

Gabrielle Clappison

Chair person

Warners Bay Areas Sustainable Neighbourhood Group

<http://www.sustainableneighbourhoods.org.au/warners-bay-area.html>