

**Submission
No 8**

**INQUIRY INTO PROTECTION OF THE ENVIRONMENT
OPERATIONS AMENDMENT (CLEAN AIR) BILL 2021**

Organisation: Future Sooner

Date Received: 23 June 2021

Submission to Parliament in relation to the Protection of the Environment Operations Amendment (Clean Air) Bill 2021

Context

Member of Parliament Abigail Boyd has raised an Act to amend the Protection of the Environment Operations Act 1997 to provide for the standards of concentration for emissions of certain air impurities that are not to be exceeded in relation to coal-fired power stations.

Our interest in this

Future Sooner is a group of citizens living in the Central Coast and Lake Macquarie regions, who are concerned about the health effects of the air pollution from the coal-burning power stations in the area.

In particular, we are concerned with the impacts of air pollution on the well-being of our community coming from the Delta Electricity Vales Point facility.

We ask that if the committee is taking evidence from witnesses in this enquiry, that Future Sooner be given the opportunity to speak.

Medical evidence

Medical evidence gathered by local epidemiologist Dr Ben Ewald indicates that approximately 650 children in the area have asthma that can be directly attributed to nitrogen dioxide emissions from coal-burning power stations.

Asthma is an extremely unpleasant and frightening condition requiring continual treatment. It disproportionately affects children and in extreme cases can be life-threatening. What parent ever wants to see their child gasping for breath, especially when they know asthma is a preventable condition?

Mothers in the local area have told us how scared they were when their young children were first diagnosed with asthma; how there was no incidents of asthma in their family before they moved into the area; how their child couldn't breathe and there was nothing they could do except rush them to hospital.

Pollution standards

The NSW standard for coal-burning power station emissions is 800 milligrams per cubic metre. Vales Point power station has an exemption licence that for nearly ten years, has allowed it to emit at 1500 mg/m³.

This is 10 times the emission levels of Europe, the USA, China. It is also many times the limit of 57mg/m³ standard of Japan. Yet this is not enough for Delta Electricity. It has now applied for Vales Point to be exempt from NSW pollution standards for yet another 5 years.

Funding for upgrades is available

Future Sooner acknowledges that the Amended Clean Air Bill goes a long way to reducing pollution from coal-burning power stations, but we consider that the current NSW emission limits are too high and that power station owners should be required to reduce their emissions to something closer to an international standard.

The technologies to enable this are well-established and eminently affordable in the context of the revenues these power stations generate. The owners of Vales Point bought the power station for \$1m, and twelve months later it was valued at nearly \$800 million. In the last financial year they've received \$62m in dividends. Clearly, the owners can afford to upgrade the power station to NSW standards.

Measuring up to the rest of the world

Ensuring that all coal-fired power stations meet NSW emission standards is a first step that will create immediate and measurable improvements for the health of the residents of Lake Macquarie and the Central Coast, particularly the children: just because you can't see these emissions, doesn't mean they're not there.

	SO ₂ (mg/m ³)	NO _x (mg/m ³)	PM (mg/m ³)	Hg (ug/m ³)
China	35	50	10	30
Japan	68.3	57.5	14.3	10
South Korea	142.5	102.5	10	50
EU	130	150	8	2.0/4.0
US	640	640	23	1.7/15.3
NSW	1700/1900	1100/1500	50	50

Implementing emission controls on coal-burning power stations that at least equal those of Europe is paramount.

Available technologies to reduce pollution include:

- wet scrubbers, or flue gas desulfurisation which can remove up to 99% of sulfur pollution and also remove mercury¹
- selective catalytic reduction methods which can be added to power stations to reduce over 90% of oxides of nitrogen from emissions²

Environment Minister Matt Kean said “*everyone who lives and works in NSW deserves to breathe clean air.* <https://bit.ly/2RjBGhm> Sadly, at the moment, the children of the Central Coast and Lake Macquarie are not seeing much evidence of that.

We’ve made great strides in reducing the road toll in past decades. This is our opportunity to take the same effective steps to reduce the damage to our health from the polluting emissions of coal-burning power stations.

Future Sooner asks that we have the opportunity to present to this enquiry.

Terms of reference

That:

- (a) the Protection of the Environment Operations Amendment (Clean Air) Bill 2021 be referred to Portfolio Committee No. 7 – Planning and Environment for inquiry and report,
- (b) the bill be referred to the committee at the conclusion of the mover's second reading speech,
- (c) the committee report by 27 August 2021.

Addressing these terms

- a) Future Sooner supports the proposal to refer this amendment to Portfolio Committee No. 7 – Planning and Environment.
- b) We support the proposal that the bill be referred immediately after the mover’s second speech. We encourage the Portfolio Committee to report by 27 August 2021, with a view to amending the Act this year. We believe that the sooner these polluting stations can be required to adhere to a reasonable pollution standard, the sooner we can see a reduction in asthma cases in or local area.

¹ Leon Walker, Wet Scrubbing 'Most Versatile, Cost Effective Air Pollution Control, (21 January 2014) Environmental Leader. Available at: <https://www.environmentalleader.com/2014/01/wet-scrubbing-most-versatile-cost-effective-air-pollution-control/>

² Clean Air Technology Center, Technical Bulletin: Nitrogen Oxides (NOx), Why and How They are Controlled (1999) United States Environmental Protection Agency. Available at: <https://www3.epa.gov/tncatc1/dir1/fnoxdoc.pdf>

Relevant amendment

The Act proposes this amendment to *Section 128 Standards of air impurities not to be exceeded*

Insert after section 128(1)

Despite subsection (1), the occupier of a coal-fired power station must not carry on any activity, or operate any plant, in or on the power station in a manner that causes or permits the emission of an air impurity specified in the table to this subsection in excess of the standard of concentration specified opposite the air impurity.

Air impurity	Standard of concentration
Nitrogen dioxide (NO ₂) or nitric oxide (NO) or both, as NO ₂ equivalent	200 mg/m ³
Sulfur dioxide (SO ₂)	200 mg/m ³
Solid particles (Total)	20 mg/m ³
Mercury (Hg)	1.5 µg/m ³