Dear Sir or Madam,

The Public Health Association of Australia (PHAA) is recognised as the principal non-government organisation for public health in Australia working to promote the health and well-being of all Australians. It is the pre-eminent voice for the public’s health in Australia, and seeks to drive better health outcomes through increased knowledge, better access and equity, evidence informed policy and effective population-based practice in public health.

There is currently a great opportunity for better population health outcomes through reducing exposure to fine particle air pollution by mandating modern pollution control technologies for the five operating coal-fired power stations in NSW. The power stations were all built last century, before the health impacts of fine particle pollution were well understood. The licenses issued at the time of construction have mostly not been modified since, leaving the permitted emissions to air at levels that are many multiples of the emissions limits in other countries. The exceptions are Vales Point and Liddell which were retrofitted with fabric filters to replace the ineffective electrostatic precipitators in 2007 and 2008. This is a clear precedent for the next step, fitting systems for flue gas desulphurisation and selective catalytic reduction to control SO2 and NOx.

Credible research recently released by Environment Justice Australia estimated the annual health burden from coal fired electricity generation in New South Wales alone to include 279 premature deaths, 233 babies born below 2.5Kg in weight, and 361 cases of incident type two diabetes. The costs of health damages associated with coal fired electricity generation in Australia have been estimated at $2.6 billion per annum. These are substantial health burdens that warrant prompt intervention, as the burden recurs every year that the pollution remains unabated.

PHAA does not believe it is reasonable to subject the population to this recurrent annual health burden by delaying action while further studies are conducted to more precisely measure the impact. The precautionary principle requires us to act at this level of information despite some uncertainty.

PHAA is strongly committed to equity principles in the management of health, and in the case of air pollution some of the most disadvantaged communities have the highest local emissions to air. This is compounded in communities like Lithgow and Wyee by the absence of ambient air monitors which would allow the community to understand its exposure.

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2 Armstrong (2015) coal and health in the Hunter: Lessons from one valley for the world. Melbourne: Climate and Health Alliance
Recommendations

1. The EPA should urgently request an evaluation by the NSW health department of the health impacts of coal fired electricity generation, to be delivered before the new license conditions are set.
2. The license conditions should be revised so as to mandate best available retrofit technology.
3. Communities close to generators, such as Lithgow and Wyee should have ambient air monitoring stations run as part of the OEH network.

The PHAA appreciates the opportunity to make this submission and the opportunity to contribute to improved health for NSW residents.

Please do not hesitate to contact us should you require additional information or have any queries in relation to this submission.

Yours Sincerely,

Terry Slevin
Chief Executive Officer
Public Health Association of Australia

Dr Peter Tait
Co-convenor PHAA Special Interest Group
Ecology and Environment