Commentary by CPCFM on submissions / Correspondence made by

Dr Ben Ewald and Dr James Whelan to The Chief Scientist

8th Jan 2016

1. We, at the Correct Planning and Consultation for Mayfield Group ( CPCFM ) are now reviewing submissions / Correspondence from Dr Ben Ewald and Dr James Whelan, which they kindly sent to us.

We note these submissions / Correspondence were provided to the Chief Scientist, as part of your investigations into the rail corridor coal dust issue.

We will send a copy of this Commentary to Ben and James today.

2. We note that these submissions / correspondence are not listed on your web site under the section headed “The Public Submissions to the Rail Coal Dust Review”.

We believe it is very important that all submissions, as well as meeting notes, etc, with various parties, are displayed.

Will you please confirm that you will now display them, and any other submissions, commentaries, etc, that you have - or will in the future, receive; including this CPCFM Commentary?

3. Based on your terms of reference, we believe that the discussion that the Chief Scientist is having internally, and with outside parties, should be based on the coal particles, and the coal sources that lead to the formation of those particles.

We note that Coal dust is the focus of the terms of reference set for you by the government.

4. CPCFM also believes that the other particulates that are present in the rail corridor are an interesting topic, and that many of them are very important to Human Health.

We note they include sand, dirt, grain dust, pollen, minerals, brake dust, metal grindings, rust and a host of other materials that may originate from outside the coal industry.

You could also add to this list, the diesel emissions from tens of thousands pa of Coal Trains in the Hunter Coal Chain Train Corridor

We don’t say: "they don’t need attention and remediation".

We do say: “if they are not directly Coal Related, they are outside your present remit; and that Coal dust is the focus of the terms of reference set for you by the government”.

5. CPCFM is concerned that the submitted material by Dr Ewald and Dr Whelan are related to particulate matter in the rail corridor, and not directly to coal dust or the coal industry, and its train origin, which is the subject of your investigations.

Some of our detailed concerns are:

 Firstly the material from Dr Ewald

6. The letter to the Medical Journal of Australia relates to air pollution and not solely to coal dust.

The key issue is what proportion of the air mass is coal particles?

The document titled Health and Coal Transport is Ben’s work, based on a Community Group Study into corridor air pollution.

Four members of that Group - The Dust and Health Subcommittee of the Coal Terminal Action Group ( CTAG ), were CPCFM executive members.

That study made no assessment of the coal dust. The assessment was for air particulate matter as a total body.

The letter to you raised the issue of air pollution and not just the coal dust component.

Secondly the Material from Dr Whelan

7. We note James raised the following issues with you as part of your inquiry.

*The Best Practice Guide to Coal Dust Minimisation prepared by Katestone consultants for the NSW Government (Note especially page 193 where covering wagons with a lid or tarpaulin is identified as best practice)*

*2. Katestone’s Literature Review of Coal Train dust minimisation techniques, December 2014. (Note especially pages 56-57 where the benefits of covering coal wagons include a 9% reduction in fuel consumption, and page 74 where covering coal wagons is assessed as more highly effective than veneering)*

*3. The report of the 2013 Senate Inquiry into Health Effects of Air Quality (note especially Recommendation 6)*

*4. The proposed Hume Coal underground mine in the NSW Southern Highlands (the proponents are committed to covering wagons to control emissions  - see page 19)*

*5. The proposed coal export terminal in Bunbury, Western Australia, where covered coal wagons and an entirely enclosed coal stockpile are proposed.*

 *You will note from the 2014 Katestone report that the only studies that identify a benefit from veneering have been commissioned by mining companies. There has been no independent research to validate the comparative benefits of veneering compared to properly covering wagons.*

8. When considering those points we ask that you take into account the following:-

A. Katestone Best Practice Guide.

This is one of a number of similar type documents, very few of which promote the covering of coal wagons.

The Katestone document does not consider the practicality of its best practice.

The covering and uncovering of coal wagons, whilst the train is moving during the loading and unloading process, would be unachievable.

B. Katestone Literature Review

A critique of this document was provided to the EPA by CPCFM.

We will provide a copy to you, when you visit Newcastle next Tuesday.

Our critique raised a considerable number of issues, and certainly challenged much of the commentary provided in the Katestone document.

From pages 56 and 57 - The coal wagons retrofitted with lids for grain were removed from service and the lids removed, to allow continuing coal transportation use.

The 99% reduction quoted does not state what the value of the 100% was, so is meaningless.

The 9 % fuel saving quoted was from a 2010 LLNL study and was based on aerodynamic drag.

The Literature review did not state if the locos were electric or diesel, the train speed, or the style of the wagons.

A Hunter Valley study would be needed, to make this statement meaningful.

From page 74 the reference to covered wagons being better than veneering is clearly not an issue, given that there is no benefit from veneering in the Hunter Valley.

C. The Senate Inquiry

This was a study about air quality and not coal dust in the rail corridor.

Chapter 4 did provide a section on the coal industry, and it is true that Recommendation 6 of the committee recommends that states and territories require industry to implement covers on all coal wagon fleets**.**

The Inquiry however failed to provide any information to support it’s recommendation.

The chapter did point out that some covers are used to combat climatic conditions like ice and cold.

It should be noted that much of the input to the inquiry was from Queensland, where veneering does have some value.

D. Hume Coal proposal

The Hume coal project is simply a proposal for a small underground coal mine in the NSW Southern Highlands.

The Planning and Environment Department’s Environment Assessment Requirements do not require covered wagons.

The EIS is not due to be submitted until late 2016.

The sale of the Cockatoo Coal shareholding in this mine to overseas interests may change the covered wagon suggestion.

The Hume proposal does not explain how coal wagons will operate pollution free; and how the recirculation of corridor particulates will be addressed.

E. Bunbury

This is a West Australian proposal, just like a number of other pipe dreams across the country, which float various concepts to assist their promoters in gaining approval.

The Bunbury proposal is small and may never eventuate.

Parent company Lanco has financial issues that may prevent the Griffin proposal proceeding.

CPCFM is keen that the Chief Scientist and Engineer is provided with the facts relevant to coal dust emissions in the rail corridor.

CPCFM believe that your web site is a key Information Source - for the distribution of information and facts related to coal particulates; and we repeat our suggestions above, to encourage you to list this Commentary, and all other correspondence, in your submissions site.

We trust this Commentary will assist the Chief Scientist in coming to a clearer understanding of these problems.

Please confirm receipt of this Commentary

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 \*\* CPCFM was established in 2010, and has about 500 members  and supporters.