



Lithgow Environment Group Inc.

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Preserving the Balance of Nature

NSW EPA
Locked Bag 5022,
Parramatta NSW 2124

Dear Sir/Madam,

Re: **Submission Draft Protection of the Environment Operations (Clean Air) Regulation 2022**

Thank you for the opportunity to provide a submission for the draft POEO Clean Air Reg 2022 review.

Lithgow Environment Group supports a regulation that will reduce our current emissions **now** for all industries and other known sources inclusive of all heavy metals not just nitrogen oxides, sulphur dioxide, mercury, nanoparticles, particulate matter immediately and not in 3-8 years for heavy polluting industries. Communities like Lithgow expect that government will ensure high quality standards giving a secure sense of protecting from harmful contaminants, reducing the known health impacts statistics¹ and addressing climate change.

Lithgow Environment Group opposes with the current regulations in particular:

- The fact that under the draft reg, MPPS will be required to transition to Group 5 limits in 2025 and Group 6 limits in 2030, but that based on draft Regulation, it can apply to be exempt from more stringent limits.
- The effect of this is that MPPS may avoid having to reduce its pollution as it ages, which goes against the intent of the 'phasing' provisions in the draft Reg.
- As was seen with the EPA's recent assessment of Delta's application for a NOx exemption for Vales Point Power Station:
 - o the current legislative scheme does not give rise to a rigorous, health-based assessment process of pollution standards;
 - o the application by operators for exemptions should involve them having to provide a Health Impact Assessment and studies of what potential pollution controls can achieve in terms of emission reductions.
 - o the assessment by the EPA of applications for exemptions should involve the EPA considering health impacts in more depth. Further they should assess what pollution reduction is "possible" with the use of pollution control technology – not just what the operator says they are planning to implement.
 - o There is a precedent for power stations (e.g. Vales Point) to be given exemptions – which defeats the purpose of the draft Regulation.

The Lithgow community has additional high levels of concerns raising anxiety with recently announced proposal by the NSW government with the West Lithgow Precinct with additional toxic pollutants

There is credible evidence worldwide including research in Australia that NSW government need to be proactive not reactive to reduce, reduce, reduce emissions, to reduce, reduce, reduce the current impacts on individuals health² *Geospatial Health 3(2), 2009, pp. 257-263 Long-term exposure to gaseous air pollutants and cardio-respiratory mortality in Brisbane, Australia.*

Lithgow Environment Group has participated for over 13 years with the Mt Piper Power Station Community Consultative Committee and as expressed over that time with the existing licence requirements for emissions and monitoring systems being inadequate and failing community & environment. Lithgow Environment Group have

repeatedly asked for an independent ambient air quality monitoring system. It is long overdue. Public availability 24/7 online. To date it has been ignored.

Lithgow is transforming and proactively preparing now with a sustainable economic future away from coal fired energy and coal mining with Lithgow City Council pursuing one of its natural assets to become renowned state, national & international, including the new Gardens of Stone State Conservation Area as a clean air environment.

Lithgow Environment Group oppose any delay with reducing the existing hazardous air pollution, to remove the West Lithgow Precinct in its current form and relabelled under the other special activation precincts for tourism and zero emissions renewable projects.

Your truly

Julie Favell

Renewables Transition/Natural Areas Liaison Officer

Lithgow Environment Group Inc.

Ref: 1. World Health Organization. Regional Office for Europe. (2006). Air quality guidelines global update 2005: particulate matter, ozone, nitrogen dioxide and sulphur dioxide. Copenhagen: WHO Regional Office for Europe. Available at: <https://apps.who.int/iris/handle/10665/107823>.

Ref: 2 [Geospatial Health \(cnr.it\)](#)