

From: [Nicholas Aberle](#)
To: [Hazelwood Info Shared Mailbox](#)
Subject: Additional comments on air pollution and health
Date: Tuesday, 6 October 2015 3:08:07 PM
Attachments: [image002.png](#)

Dear Hazelwood Inquiry,

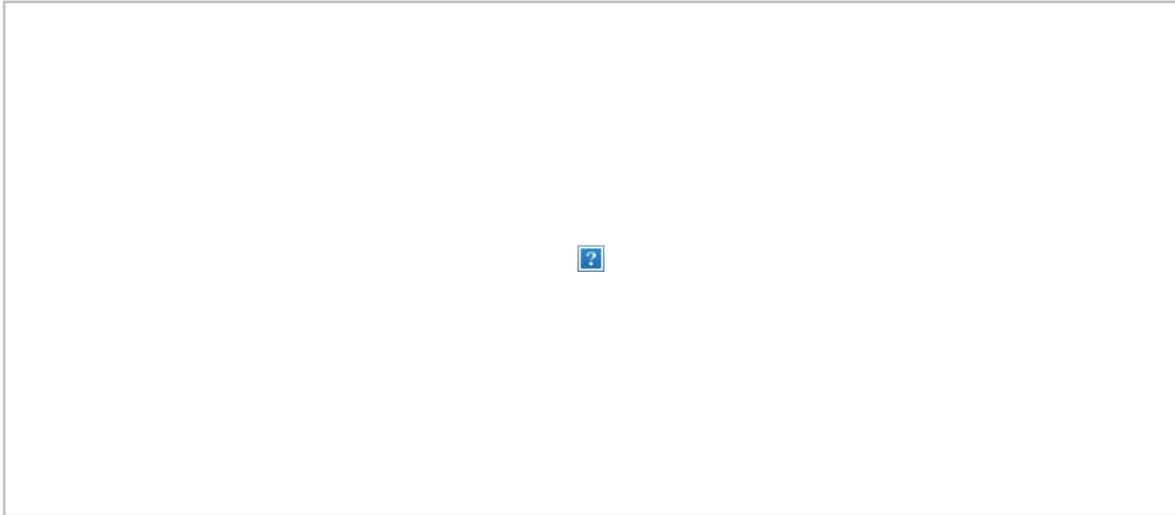
I was told that the inquiry is accepting additional comments on Term of Reference 7. I'm not sure whether this is true (I can't see evidence of this on your website), but I intended to provide some follow-up comments after the Healthy Environments session in Traralgon last week anyway, to clarify some of the points I made on the day.

- As pointed out in [our initial submission](#) on health issues, the power stations in the Latrobe Valley are four of the five largest point-source emitters of PM2.5 in the country. This adds up to 14% of total point-source PM2.5 in the entire country, discharged into one valley. (This excludes diffuse-source PM2.5, from bushfires, combustion engines, wood heaters, etc).
- According to records held by the [National Pollutant Inventory](#) (maintained by the Federal Environment Department and contributed to by state EPAs and each regulated facility), the power stations haven't done much by way of pollution abatement. It is possible the NPI is out of date or otherwise not correctly updated, but there needs to be some transparency around what efforts have been made to reduce pollution. The inquiry should recommend that these power stations conduct a thorough audit of all measures taken in the past 10 or 20 years to reduce air pollution (this could be limited to PM2.5 but could equally be extended to other pollutants such as mercury, SO2, etc).
- Further, power stations should be required to provide a list of possible measures that could be taken to reduce pollution in future. This could include an assessment of which technologies are currently available, which of these can physically be installed at the power stations (perhaps some can't be retro-fitted to existing infrastructure), what the costs of these technologies are, and how much these technologies would reduce pollution. Until this information is compiled, it is difficult to assess what the real options are.
- It is worth noting that, generally, there has been no real decline in PM2.5 pollution from the power stations in the past several years (see table and graph below). Current levels are above 2007/2008 levels (although there have potentially been changes in methodology in how these figures are estimated by the power stations). The decrease in pollution levels in the past two years can be at least partly attributed to falling power output, meaning they are producing less pollution simply because they are generating less energy, not because each unit of energy has become less polluting. This is a problem because output could increase in future (especially with the repeal of the Federal carbon price), returning pollution levels to where they were.
- An audit by power stations of previous and potential use of technology to reduce air pollution is not a burdensome activity, could be completed relatively quickly, and the information would be valuable for government and the community in understanding the options that are available and the trade-offs involved.
- There was much discussion throughout the day of a range of measures to improve health in the Latrobe Valley. Most of these were excellent ideas, such as improving access to active transport, better education around diet/cooking/fresh food, encouraging higher participation in sporting clubs. Many of these will build on programs that either already exist or are under development by state and local government. If these programs are being developed by state government, a case could be made that pilot programs could be first tested in the Latrobe Valley, in an effort to accelerate the benefits in the area.
- Having said that, the Inquiry should consider what can be done to improve health in the Latrobe Valley specifically, rather than only make broad endorsement of programs that will have state-wide application or relevance. That is, what are the peculiar challenges to health in the Latrobe Valley? It is for this reason that we encourage the Board to look very closely at sources of air pollution that are unique to the Valley.
- To reiterate the point I made during the session, processes like EPA approvals or Environmental Effects Statements have the potential to inflict death by a thousand cuts. The approval of any single development might only create a small increase in air pollution, but the approval of many such projects will significantly add to the overall air pollution burden in the area. In the same way the Valley has a "special use zone" for coal projects, the Inquiry could consider applying the idea of the "health conservation zone" to the Latrobe Valley that could set a tighter standard for acceptable air pollution, in recognition of the poor health outcomes in the area.
- Air pollution standards are also critical. The EPA points out that air quality, as measured, is typically within current standards, but there needs to be a discussion of whether the standards themselves are appropriate, and whether the standards are actually allowing a level of health damage that should be avoided.

I would be happy to discuss any of these points in more detail.

Nick Aberle.

PM2.5 from coal power stations	2007-08	2008-09	2009-10	2010-11	2011-12	2012-2013	2013-2014
Yallourn	422,000	2,130,000	2,000,000	2,020,000	1,970,000	1,414,000	1,367,800
AGL Loy Yang A	851,475	853,000	929,523	2,300,431	1,826,951	1,741,613	1,403,383
Loy Yang B	632,000	207,000	498,014	847,008	872,013	775,035	1,005,772
Hazelwood	511,314	8,273	6,242	687,868	609,281	553,756	597,786
Total	2,416,789	3,198,273	3,433,779	5,855,307	5,278,245	4,484,404	4,374,741



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