



Dear Commissioners,

The Upper Hunter Air quality monitoring network has been showing that air pollution in Singleton exceeds the National Air Pollution Standards for PM10 for multiple sites, and is close to or exceeds PM2.5 standards for multiple sites.

We have reviewed the transcript of the meeting between Dr Craig Dalton, Dr Kirsten Williamson and Dr Richard Broome, representing NSW Health, with the Independent Planning Commission in August 2019. At this meeting, the transcript implies that NSW Health was happy with the project to proceed, provided Camberwell residents had acquisition rights if the PM10 levels at private residences exceeded annual PM10 standard levels.

We have the data from the Upper Hunter Air Quality Monitoring Network that this is already happening for Camberwell village. What is not addressed in the transcript of the meeting between NSW Health and IPC, is that Maison Dieu and Singleton NW monitors are now also breaching National Standards for PM10. They both have for over 12 months now.

Maison Dieu has had 40 alerts for PM10 having breached 24hr rolling averages this year, and Singleton NW is at 39 alerts. These are projected to increase. This has worsened despite compliance measures already in operation for existing mines. Last year there was great concern when Camberwell had 44 alerts for the entire year, which prompted an updated air quality assessment of the impacts of the Rixs Creek Project.

The IPC received an updated report from Todoroski Air Science, after concerns were raised by NSW Health. It found Rixs Creek North/South mines were responsible for 30% of the PM10 pollution in Camberwell. This mine has similar proximity to Maison Dieu and Singleton North. Our other concern is Todoroski is still utilising 2015 "background" data to make predictions of exceedances. We know this is misleading as 2018 and 2019 have been significantly worse overall than 2015.

This report is understating the likely effect this mine's ongoing effect will be on Singleton, and has not addressed the risk to private residences in Maison Dieu and Singleton North. There are significantly more homes within 2km of the Singleton NW monitor than there are at Camberwell. Please see the attached picture addressing this. The IPC needs to acknowledge the Singleton NW monitor is in close proximity to dense population and is exceeding Air Quality Standards as a result of Rixs Creek ongoing activity.

It is our professional opinion as healthcare providers that NSW Health cannot sign off on Rixs Creek until private residences at both Maison Dieu and Singleton Heights have had a detailed, valid assessment of ongoing air pollution effects. If the same procedural justice was applied regarding negative effects, the National Air Pollution Standards, and acquisition rights, it would logically follow that Bloomfield (owners of Rixs Creek) would need to have as part of their consent conditions acquisition rights for private residences in Maison Dieu and Singleton North, which would likely make the project financially nonviable.

We're also concerned NSW Health are happy to sign off on a project which has significant greenhouse gas emissions, when many health bodies recognise climate change is the biggest threat to global public health. These bodies, which include the AMA, RACGP, RACP and others, have advocated for transition of the energy infrastructure away from thermal coal. We would direct your attention also to the most recent media release from the college of physicians regarding air pollution.

<https://www.racp.edu.au/news-and-events/media-releases/physicians-join-calls-for-stronger-national-air-pollution-standards-to-prevent-harm-to-health/>

The negative health effects of this project have not been adequately addressed, and as such it is our professional opinion that the project does not have merit.

Kind regards,

Dr Bob Vickers  
FACRRM, DRANZCOG Advanced, MBBS, Bachelor Medical Science  
General Practitioner and Visiting Medical Officer Singleton Hospital

Dr. John Van Der Kallen  
Rheumatologist, MBBS, B Sci (Med), FRACP  
Doctors for the Environment Australia (DEA), Chair NSW  
Conjoint Lecturer, University of Newcastle, Australia

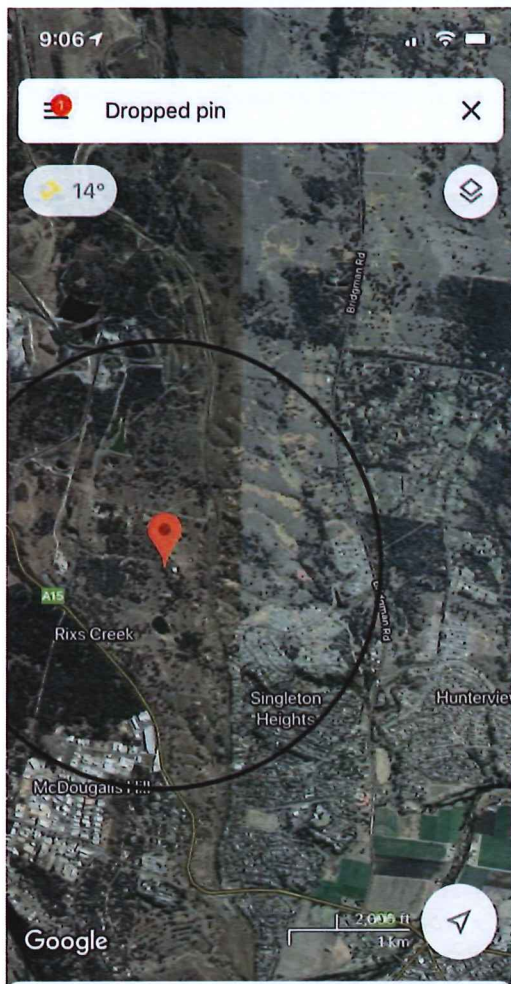


Figure 1. Singleton NW Monitor

2km radius labelled showing significant population being exposed to harmful levels of air pollution. The closest open cut pit to this monitor is Rixs Creek South.

Dropped pin

Near Rixs Creek NSW 2330

1 hr 8 min