

10 September 2015

SUBMISSION TO THE INQUIRY INTO THE PROPOSED LEASE OF THE PORT OF MELBOURNE

The following submission is made on behalf of the Maribyrnong Truck Action Group (MTAG). This submission focuses on the environmental impacts of the Port of Melbourne.

MTAG is particularly concerned with the impacts of truck freight traffic generated by the Port of Melbourne. These trucks have a detrimental impact on residents living in Melbourne's inner west suburbs. This submission highlights the opportunities that the Port of Melbourne lease sale provides to reduce these impacts.

MTAG is a resident based lobby group advocating for a reduction in truck numbers on residential streets in the inner western suburbs of Melbourne. We are not affiliated with any political parties and we are funded purely by memberships and donations. MTAG works closely with other community groups, including Less Trucks for Moore, an associated Footscray-based group facing similar impacts from port truck freight.

MTAG believes the proposed lease of the Port of Melbourne is a once in a generation opportunity to address the health impacts of truck related diesel pollution on neighbouring communities.

This can only be achieved if the enabling legislation ensures:

- That the new lessee is made responsible for strict environmental controls over the quality of the truck fleets using the Port.
- That it requires the lessee to assist with the development of freight on rail infrastructure.
- That the government ensures the development of new road freight infrastructure as well as the implementation of local residential truck bans.

The balance of this submission provides a summary of evidence in support of these claims.

BACKGROUND:

The Port of Melbourne is Australia's largest container port by volume. Currently the main means of transport for freight, in and out of the Port, is via diesel-powered trucks. The port generates over 5 million truck movements each year, many of these are on narrow residential streets in Melbourne's inner west. More than 21,000 trucks travel through the City of Maribyrnong every single day, most of these driving within metres of homes, schools and childcare centres.

Freight Movement Facts:

- *21,000 truck movements per day in the City of Maribyrnong*
- *Trucks use narrow residential streets never designed for container truck movements*
- *Francis Street, a residential road in Yarraville carries more than 4600 trucks per day¹*
- *Somerville Road, a local council street in Yarraville, carries over 1700 trucks each day²*
- *72% of truck movement in the City of Maribyrnong are generated by the Port of Melbourne³*

HEALTH IMPACTS OF PORT TRUCK MOVEMENTS ON HUMAN HEALTH:

There are clear links between trucks, diesel emissions, air quality and public health impacts. In 2012, the World Health Organisation (WHO) upgraded the cancer risk from diesel exhaust from 'probably carcinogenic' to 'carcinogenic to humans'.⁴ There is a vast amount of medical evidence documenting other acute and chronic health effects from exposure to diesel exhaust. These include, but are not limited to, cardiovascular disease, stroke, cardiopulmonary disease, asthma, chronic obstructive pulmonary disease, hypertension, low birth weight babies as well as decreased lung development and function in children.⁵

Recent air quality monitoring conducted by the EPA in Francis Street, Yarraville, showed air pollution levels are already higher than at any monitoring station in metropolitan Melbourne. Of most concern were the recorded levels of PM_{2.5}, which exceeded the annual advisory standard.⁶ These ultra-fine particles are particularly dangerous to human health; they penetrate the walls of our lungs, make their way into the bloodstream and travel around our bodies, even getting into the brain.

We are already seeing health effects in our communities from excess truck traffic. In the year 2009 - 2010 VicHealth found that Maribyrnong had Victoria's highest rate of hospital admissions for respiratory illness in children. In 2009 the Department of Education and Early

¹ GHD Report Inner West Truck Survey, June 2014, GHD Report Inner West Truck Survey, June 2014, <https://www.vicroads.vic.gov.au/business-and-industry/heavy-vehicle-industry/heavy-vehicle-road-safety/truck-curfews/truck-curfews-in-the-inner-west>

² GHD Report Inner West Truck Survey, June 2014

³ GHD Report Inner West Truck Surveys, June 2014

⁴ World Health Organisation, 2012, Press Release No 213 12 June, IARC Diesel Engine Exhaust Carcinogenic, http://www.iarc.fr/en/media-centre/pr/2012/pdfs/pr213_E.pdf

⁵ Irina N. Krivoshto, BA, John R. Richards, MD, Timothy E. Albertson, MD MPH, PhD and Robert W. Derlet, MD, Journal of the American Board of Family Medicine, January – February 2008, 'The Toxicity of Diesel Exhaust: Implications for Primary Care', <http://www.jabfm.org/content/21/1/55.full>

⁶ EPA Victoria, Francis Street monitoring program – Final report, December 2013 <http://www.epa.vic.gov.au/~media/Publications/1546%201.pdf>

Childhood Development released an Adolescent Health and Wellbeing Survey revealing that asthma rates among City of Maribyrnong adolescents were 50% higher than those in the Western Metropolitan Region and the rest of Victoria.⁷ The health issues we are now facing will become a crisis without intervention.

Trucks on our streets also cause excessive noise pollution, high enough to be detrimental to health. The World Health Organisation guidelines for night noise recommends an annual average noise level of less than 40 dB(A) outside of bedrooms to prevent adverse health effects and less than 35 dB(A) in classrooms to allow good teaching and learning conditions.⁸ In 2013 the EPA undertook noise monitoring on Francis Street for 12 months. The average noise level on a weekday was found to be 76 db(A). Even during Sunday curfew hours the average noise level was 71.1 dB(A).⁹ This is almost 50% higher than the VicRoads noise limit at which the installation of noise walls would be required. In 2014 the EPA carried out noise monitoring on Moore Street and Somerville Road. The noise levels on those streets measured at around 70 db(A). Noise monitoring was also undertaken in 2015 on these streets after new curfews were introduced however the levels remained unchanged, due to the short length of curfew times and local operator exemptions in place. Residents remain highly impacted by excessive noise, the most affected being those trying to sleep at night and children trying to learn at schools on Somerville Road.

Health impacts linked to long-term sleep disturbance include obesity, diabetes, cardiovascular disease, anxiety, depression and increased drug and alcohol use. Constant disruption in sleep and circadian rhythms causes fatigue and decreased alertness, raising the risk of accidents, injuries and death. It affects performance and productivity at work and school and decreases motivation and enjoyment of life. Children are particularly vulnerable to noise and sleep disturbance as they spend more time in bed than adults and need more sleep. The elderly, shift workers, pregnant woman, the chronically ill and those with a mental illness are also more sensitive to sleep disturbance.¹⁰

Excessive truck traffic on our streets also cause serious safety concerns. Our narrow roads, built in the 1800's were not designed for semi trailers or B-doubles. Many trucks need more space to turn corners safely and can cut across lanes causing confusion for cars and other road users. Tight corners also mean trucks often mount the curb when turning, putting pedestrians and cyclists in danger. The greater mass and inertia of trucks meant they take longer to stop and there are regular reports of trucks running red lights at intersections and school crossings. Sudden stops can cause trucks to jack knife, putting all road users in danger. The rail overpass on Napier Street in Footscray is the most hit bridge in Melbourne, with containers regularly toppling on to the adjacent road and footpath.

⁷ Department of Education and Early Childhood Development, Adolescent Community Profile, City of Maribyrnong 2010, <http://www.education.vic.gov.au/Documents/about/research/acpmaribyrnong.pdf>

⁸ World Health Organisation Data and Statistics on Noise Pollution, 1999, <http://www.euro.who.int/en/health-topics/environment-and-health/noise/data-and-statistics>

⁹ EPA Victoria, Francis Street monitoring program – Final report, December 2013 <http://www.epa.vic.gov.au/~media/Publications/1546%201.pdf>

¹⁰ Stansfield SA, Matherson MP, Noise Pollution: non-auditory effects on health, 2003 <http://bmb.oxfordjournals.org/content/68/1/243.full.pdf>

MTAG have been collecting reports of truck incidents on our roads. The list clearly proves that the presence of so many trucks on our narrow streets threatens everyone's safety, including the truck drivers.¹¹

In 2014 a working group formed between the EPA, Maribyrnong City Council, Department of Health and VicRoads commissioned GHD to undertake a Truck Movement Survey in the inner west. This survey found that up to 72% of trucks on residential streets in the inner west had a Port of Melbourne origin or destination.¹²

In 2014 the Truck Industry Council estimated in a government submission on air quality that 50% of these trucks are pre-1995, with no exhaust emission standards. One pre-1995 truck engine emits sixty times the diesel particulate matter of a similar size and power engine in a post-2007 truck. These less reliable older trucks become too costly to maintain on long distance operations and 'typically these trucks are brought back into city operations around ports and construction sites'.¹³

Forward projections estimate container trade will treble by 2035. International container trade will increase from 1.4 million to 7 million containers per annum.

Health Impact Facts

- *Maribyrnong adolescents have asthma rates 50% higher than the State average*
- *The Victorian EPA recorded the state's highest levels of diesel related air pollution on Francis in Yarraville*
- *Maribyrnong has the highest rate hospital admissions in Victoria for respiratory illness in children*
- *Noise levels on residential truck routes in Maribyrnong far exceed WHO guidelines*
- *Exposure to diesel exhaust causes: cardiovascular disease, stroke, cardiopulmonary disease, asthma, chronic obstructive pulmonary disease, hypertension, low birth weight babies and decreased lung development and function in children*

¹¹ Maribyrnong Truck Action Group, Truck Incident Report, 2015 <http://mtag.org.au/truck-incident-report/>

¹² GHD Report Inner West Truck Survey, June 2014, <https://www.vicroads.vic.gov.au/business-and-industry/heavy-vehicle-industry/heavy-vehicle-road-safety/truck-curfews/truck-curfews-in-the-inner-west>

¹³ Truck Industry Council submission to the Proposed variation to the National Environment Protection (Ambient Air quality) Measure in relation to the standards for particles, October 2014. http://www.environment.gov.au/submissions/nepc/aaqnepm/55_truck_industry_council.pdf

SOLUTIONS:

The sale of the Port of Melbourne lease must be contingent on a commitment to strict environmental conditions including freight on rail and cleaner trucks. As well as these initiatives, planned new road infrastructure must become a reality.

Mandate strict environmental conditions as part of the lease contract.

These conditions would include:

- Commitment to a firm target to get freight on rail.
- Implementation of a Clean Trucks program similar to that at the Port of Long Beach in Los Angeles, which led to a 90% reduction in truck diesel pollution.¹⁴ This involved banning dirtier-exhaust pre-2007 trucks from port terminals.
- Reducing ship sourced diesel emissions by enabling ships in port to connect to local electricity to stop idling ship pollution.
- Ban the use of low-grade diesel (a class one carcinogen).
- The introduction of a Green Ships Award similar to that at the Port of Long Beach in Los Angeles, encouraging cleaner ships with reduced emissions and rewarding them with cheaper docking fees.¹⁵

Allocate the budgeted \$58 million dollars to a Metropolitan Intermodal System.

This budget allocation would see Salta Properties' plans for an intermodal hub in Dandenong South become a reality.

This would achieve:

- A reduction of 3,500 truck trips to the Port of Melbourne each day, significantly reducing truck numbers on residential streets in the inner west.
- Improved health for over 77,000 residents of the City of Maribyrnong.
- A reduction in emissions of 23,000 tonnes of CO₂ per annum
- A significant increase in the sale price of the Port Lease.
- Increased capacity at the Port of Melbourne of 1.4M TEU per annum
- Benefit from the expenditure of \$350 million on the Footscray Road overpass, built to facilitate additional trains into the Port and \$34 million for the connection of the Altona Inland Port to the rail network.
- The establishment of a network of Inland Ports in Melbourne, which can clear volume from the Port via environmentally friendly and efficient Port Rail Shuttles.
- Enhanced competitiveness of the Port, stemming the ongoing loss of business to Port Botany in Sydney due to their significant investment into freight on rail.

Port of Melbourne to support planned road freight infrastructure and the implementation of residential truck bans

MTAG calls on the Port of Melbourne to publically support proposals such as the Victorian Government's West Gate Distributor and Transurban's Western Distributor. These road projects will provide a direct truck route from the Port of Melbourne to the West Gate Freeway. If accompanied by truck bans on local residential streets, air quality in the inner west will be improved. However, the City of Maribyrnong will still be adjacent to the Port of Melbourne,

¹⁴ Port of Long Beach, The Green Port, <http://www.polb.com/environment/cleantrucks/default.asp>

¹⁵ Port of Long Beach, The Green Port, <http://www.polb.com/environment/greenship.asp>

the existing West Gate Freeway and the proposed new roads. Studies have shown that communities living near ports have elevated rates of oropharyngeal cancer and certain lung cancers. People who breathe high levels of traffic related air pollution have a higher rate of cardiovascular disease, asthma and death as well as reduced lung function.¹⁶ The City of Maribyrnong will still suffer these health effects from the vast amount of diesel pollution emanating from the Port of Melbourne.

It is essential that going into the future, the Port of Melbourne improves their environmental credentials and utilizes more sustainable forms of transport, both increasing freight efficiency and improving the health of the surrounding communities.

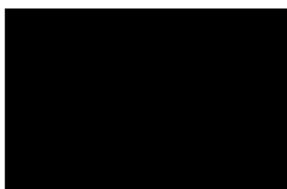
Regulate to Reduce Air Pollution:

- *Commit to a firm target to get freight on rail and fund the Salta Properties proposal*
- *Introduce a Clean Truck program to reduce diesel emissions*
- *Publically commit to new road freight infrastructure and support truck bans on residential streets*
- *Reduce shipping emissions in port with cleaner fuel and a non-idling policy*

The sale of the lease of the Port of Melbourne is a once in a generation opportunity to address air pollution issues generated by the Port of Melbourne.

MTAG's battle for the health, safety and residential amenity of residents of the inner west has been a long and frustrating one. The authorities that have had the power to address this have done very little, and this has been exacerbated by the Port of Melbourne's lack of responsibility for what happens outside of its fence. MTAG sees the sale of the lease of the Port as an ideal opportunity to end the inaction and address the significant environmental and pollution problems at the Port. Not only will this be hugely beneficial to residents of the inner west, but the resulting improved supply chain efficiency will reap significant economic benefits.

MTAG welcomes the opportunity to provide input to this inquiry.



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¹⁶ Hricko, A., 2006, Guest Editorial: Ships, Trucks, and Trains: Effects of Goods Movement on Environmental Health, U.S. National Library of Medicine, Environmental Health Perspectives, <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC1440794/>