

14/12/2020

Dear EPA Victoria,

Levels of air pollution recorded in the Latrobe Valley and in Melbourne have been associated with increased risk of death, acute asthma, preterm birth and low birthweight [1-8]. The majority of toxic pollution in the Latrobe Valley airshed comes from coal-fired power generation [9]. Recent modelling has estimated that every year pollution from the power stations causes 17 deaths among adults, 11 low weight births and 217 person-days of asthma symptoms among children in the Latrobe Valley [10]. The same modelling estimated that the pollution can travel hundreds of kilometres and that every year in Victoria it causes 190 deaths among adults, 238 low weight births and 4,024 person-days of asthma symptoms among children [10].

Latrobe Valley power stations are currently permitted to emit pollution at levels far greater than those permitted overseas. For example each Latrobe Valley power station is currently permitted to emit well over 100 milligrams of particulate matter per cubic metre of air, whereas by 2021 each European coal-fired power station of similar size will only be permitted to emit up to 12 milligrams of particulate matter per cubic metre of air [11,12]. In 2016 The Board of the Hazelwood Mine Fire Inquiry recommended that "Latrobe Valley mine operators should lead the way in implementing the best available technology to reduce emissions"[13] but this has not been done because the power stations have not been required to reduce their pollution.

We therefore request that you now require Latrobe Valley power stations to:

(a) limit their toxic pollution emissions to the same levels, or less, than will be required by 2021 for coal-fired power stations of similar size in the European Union - specifically, 175 mg/Nm³ of NOX, 100 mg/Nm³ of carbon monoxide, 130 mg/Nm³ of sulfur dioxide, 5 mg/Nm³ of hydrochloric acid, 3 mg/Nm³ of hydrofluoric acid, 8 mg/Nm³ of particulate matter and 7 µg/Nm³ of mercury [12] - and,

(b) install best practice pollution controls to reduce toxic emissions including fabric bag filters, flue-gas desulfurisation, selective catalytic reduction and activated carbon injection technology [14]

We assume that the above pollution limits are achievable for Latrobe Valley power stations based on independent expert review concluding that there are no technological barriers to designing pollution control systems for the power stations [14] and because many coal fired power stations in Europe are of a similar age or older than Latrobe Valley power stations.

We consider these interventions crucial for protecting Latrobe Valley residents and other Victorians from further harm.

We look forward to your response.

Sincerely,

Healthcare for Clean Air Gippsland
The Australian College of Rural and Remote Medicine
The Rural Doctors Association of Victoria
The Rural Doctors Association of Australia
The Royal Australian College of General Practitioners

The Thoracic Society of Australia and New Zealand
 The Public Health Association of Australia
 Lung Foundation Australia
 The Victorian Allied Health Professionals Association
 The Health Services Union Victoria No. 4 Branch
 The Medical Scientists Association of Victoria
 The Latrobe Valley Sustainability Group



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Mr Pete Venticich
Ms Stephanie Verdier
Miss Ainsley Verhagen
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Mr Keir Gregory Williams
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Ms Renee Wilson
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Ms Jodie Winnell
Mr Allan Wood
Mrs Lianne Ypelaan
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