

SWS ref: 05-31-12 & SWD12/11625



Mr David Kitto
Director
Mining & Industry Projects
NSW Department of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

Department of Planning Received 2 0 DEC 2012 Scanning Room

Dear Mr Kitto

Re: Exhibition of Amended Application Camden Coal Seam Gas Project (Stage 111 Northern Expansion Application MP 09\_0448)

I write in relation to the above project which falls within the boundaries of South Western Sydney Local Health District (SWSLHD).

Whilst not a Regulatory Authority, the SWSLHD play an important role in providing advice in relation to the risk to human health for major developments. It is unfortunate that in this instance the SWSLHD have not been formally involved in the project's consultation or referral process. The SWSLHD have therefore had no input into the Environmental Assessment process and only a very short time to review the background and extensive documentation before the closing date for submissions. The SWSLHD have conducted a preliminary review of the documents on exhibition and note that they consist of a main report and a number of appendices which mainly relate to groundwater, noise, heritage, flora and fauna issues and responses to previous submissions.

The SWSLHD works closely with local councils on various environmental issues that affect human health. In this instance we note that both the local councils affected by the expansion of the project, being Camden and Campbelltown, oppose the current proposals. Their reasons include lack of scientific certainty around the environmental and health impacts from coal seam gas mining and a possible conflict with new urban development in these growth areas.

For any significant development where there is potential for a range of environmental emissions in both the long and short term with possible human health effects the SWSLHD would ask the proponents for a specific human health risk assessment to estimate the potential health impact on surrounding populations. This would generally follow the 'Environmental Health Risk Assessment: Guidelines for assessing human health risks from environmental hazards' (Department of Health and Ageing and EnHealth Council, Commonwealth of Australia (June 2002)). This is particularly important because while risks to human health are referred to in some of the environmental assessments for this proposal there is no specific assessment of the health risks.

The SWSLHD have consulted with the Environmental Health Branch, NSW Health who concur that an environmental health risk assessment is required before adequate appraisal of the health consequences of this application can occur.

In summary, we think the Environmental Assessment is incomplete without a screening level environmental health risk assessment which would consolidate the likelihood and severity of risks to human health into a single document.

Thank you for considering these comments and should you require further clarification please contact Stephen Conaty or Graham Burgess at the South Western Sydney Local Health District Public Health Unit on 9515 9420.

Regards

Amanda Larkin Chief Executive

Date: 18/12/12