

Chemicals Management and Standards Section  
Department of the Environment and Energy  
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Submitted by email to [Minamata@environment.gov.au](mailto:Minamata@environment.gov.au)

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### **National phase-down of mercury ratification of the Minamata Convention on Mercury - exposure draft final regulation impact statement**

The Australian Energy Council (the Energy Council) welcomes the opportunity to make a submission to the Department of Environment and Energy (the Department) on the Exposure Draft Final Regulation Impact Statement (the RIS).

The Energy Council is the industry body representing 21 electricity and downstream natural gas businesses operating in the competitive wholesale and retail energy markets. These businesses collectively generate the overwhelming majority of electricity in Australia and sell gas and electricity to over 10 million homes and businesses.

We support the government taking steps to address mercury emissions in Australia, to lower risks to the environment, and reduce human exposure to this toxic substance. We support the government's preferred option- Option 4 to ratify the Convention and take additional steps which maximise the overall net benefit to the nation. Mercury is a naturally occurring element that is commonly found in modern life. It is an inescapable and persistent chemical found throughout the world and is present in the natural environment. Mercury is emitted from coal, oil and gas fired power stations when fuel containing mercury is combusted and in recognition of the risks Australia's generators have put in place measures to control emissions. Emissions of mercury from Australia's power generation are relatively small compared with other nations due to local conditions and practices to reduce emissions already in place.

Australian coal contains very low levels of mercury by world standards. Australia's coal fired power stations are fitted with bag filters and electrostatic precipitators which prevent over 99 per cent of the particulate matter from being released to the atmosphere. A proportion of the mercury contained within coal also remains present in the ash after burning and is collected and managed by the generation facility.

Australia should ensure that the best available techniques and best environmental practices meet Australia's cost-benefit requirements and are not just based on developed and developing technologies and practices in other countries, such as the USA. The USA has some very specific mercury power station emission challenges, which are not applicable to Australia. To achieve effective control of mercury from electricity generation in Australia, any measure to control emissions should be based on Australian applications. Atmospheric concentrations of mercury measured in coal-fired electricity generation regions are significantly below the guideline value set by the World Health Organisation for the concentration of mercury in air.

The electricity market is in a transition and structural adjustment of the generation mix is occurring. It is important for government to consider impacts on the electricity market which may make the process of adjustment more uncertain or increase price volatility for consumers. The schedule for closure for existing coal-fired electricity generation plant<sup>i</sup> (and no new plant in the investment pipeline<sup>ii</sup>) mean that mercury emissions from coal fired generation is likely to decrease. Where feasible, the imposition of additional technologies and other controls should only be considered for potential application to new coal-fired electricity

generation plant. Normal environmental impact assessment processes, approvals and cost/benefits assessment should also apply to adequately weigh the risk to the price of energy, reliability and security<sup>iii</sup> of power supply with environmental outcomes.

**Table 1: Planned and recent power plant closure in Australia**

State	Power station	Primary fuel	Year of commissioning	Date of closure	Age	Capacity (MW)
QLD	Swanbank B	Black coal	1970-73	May-12	42	500
NSW	Munmorah	Black coal	1969	Jul-12	43	600
QLD	Collinsville	Black coal	1998	Dec-12	14	180
NSW	Redbank	Black coal	2001	Aug-14	13	144
VIC	Morwell	Brown coal	1958-62	Aug-14	52-56	189
NSW	Wallerawang C	Black coal	1976-80	Nov-14	38	1,000
VIC	Anglesea	Brown coal	1969	Aug-15	46	160
SA	Northern	Brown coal	1985	May-16	31	546
SA	Playford	Brown coal	1960	May-16	56	240
VIC	Hazelwood	Brown coal	1964-71	Mar-17	45-52	1,760
NSW	Liddell	Black coal	1971-73	2022	43-45	2,000

Source: Electricity Gas Australia 2016 and various company announcements, as at March 2017.

We support the government in taking steps to reduce the risk to human health and the environment of mercury in Australia. An effective policy regime is required to achieve real outcomes, based on Australian applications and local conditions.

Any questions about our submission should be addressed to Emma Richardson, Policy Adviser by email to [emma.richardson@energycouncil.com.au](mailto:emma.richardson@energycouncil.com.au) by telephone on (03) 9205 3103.

Yours sincerely,



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<sup>i</sup> Australian Energy Council, 2016, Electricity Gas Australia, <http://www.electricitygasaustralia.com.au>

<sup>ii</sup> Australian Energy Council, 2017, Will coal play a role in the new NEM Figure 1: NEM Proposed projects 2004-05 to 2015-16, <https://www.energycouncil.com.au/analysis/will-coal-play-a-role-in-the-new-nem/>

<sup>iii</sup> AEMO, 2017, Future Power System Security Review, <https://www.aemo.com.au/Electricity/National-Electricity-Market-NEM/Security-and-reliability/FPSSP-Reports-and-Analysis>