



# Country Women's Association of NSW

ABN 82 318 909 926

*Incorporated in 1931 by an Act of NSW Parliament*

*All Communication to be addressed to the Secretary of Maules Creek Branch.  
maulescreekcwa@gmail.com*

21/6/23

Dear Planning,

## **Objection to Whitehaven Coal (WHC) TARRAWONGA COAL MINE – HAULAGE HOURS MODIFICATION 10.**

Submission:

"PA 11\_0047 allows for the extraction and transport of up to 3.5 million tonnes per annum (Mtpa) of run-of-mine (ROM) coal along an approved haulage route from TCM to the Gunnedah Coal Handling and Preparation Plant (CHPP) (Figure 1). The TCM has not been able to achieve its consented road haulage tonnage in recent times, primarily due to low availability of road haulage drivers and impacts of flooding events."

We object to this Modification.

1. Object to the extension of hours as it is increasing the cumulative impacts to all road users.
2. Object to extension of hours not having an end date in response to what has been highlighted as temporary issues.
3. Object to any extension of haulage including hours increase and or change prior to the WHC funded Kamilaroi Hwy road overpass being put in place. The building of the overpass should be a pre-condition of this modification approval.
4. Object to adding to the cumulative danger due to already approved increased traffic in the area from the WHC Vickery Mine and the lack of rail line being built for this project.
5. Object to this Modification using longer haulage hours to fix low availability of drivers. There is no logic that extra hours will create more drivers. What it will create is a more dangerous work environment for the (existing) workforce and other road users and native animals. Additional pressure will be applied on existing drivers to drive for longer hours. The impacts of expanding work environments conducive to heavy vehicle driver fatigue is dangerous and life threatening, when combined with an increase in traffic from Vickery start up and longer hours during the beginning and end of the day.

6. Object to WHC's increase in Scope 1 emissions from road haulage. WHC is increasing its carbon emissions through extending the trucking hours. This is inconsistent with NSW's sustainable development goals in 2023.

**Recommend:** Flood Impacts and workforce shortage are temporary impact. Adjusting road haulage hours should not be approved for these impacts. If approval is granted it should be limited to less than three months within this calendar year and no retrospective approval or extension.

**Recommend:** Any changes to road haulage hours should only be considered subject to the completion of the Kamilaroi Highway overpass.

**Recommend:** Funding for any infrastructure changes is by the company. The taxpayer must not be further subsidising WHC by putting up barriers or altering road for WHC.

**Recommend:** A refusal based on WHC increasing its Scope 1 emissions as the Vickery coal is trumpeted to occur from mid-2023, the rail line is not being built and all the pressure is on the danger to life is on the truck drivers, the general road using community and local wildlife from the danger of WHC increased road haulage.

**Recommend:** This Mod is inconsistent with WHC's commitment to reducing its Scope 1 emissions, which it has control over.

**Recommend:** The building of the overpass should be a pre-condition of this modification approval.

**Recommend:** We recommend that no approval be given for a modification that increases the safety risks and responsibility on to community road users and the truck drivers. A rejection this expansion.

Thank you for the opportunity to make a submission.

Regards

Libby Laird

Branch President.