



Mining and Energy Division

Review of Environmental Assessment
Integra Mine Complex
Overland Conveyor and Biodiversity Offset
Modification 2

Reference No: 08-0101 Mod 2 and 08-0102 Mod 2

Submission

Construction Forestry Mining and Energy
Union (Mining and Energy Division)
Northern District Branch

October 2012

On 21 September 2012 Integra Coal Operations Pty Limited applied to the Minister for the Department of Planning seeking approval to modify Project Approvals under 75W of Part 3A of the EP&A Act.

The Director General made the Environmental Assessment publicly available on the 3 October 2012 at the DoP Information Centre Sydney, Singleton Shire Council, and Nature Conservation Council Newtown.

The Union is pleased to take the opportunity to comment on the Integra Mine Complex modification and related activities Environmental Assessment.

The Mining and Energy Division is a Division of the CFMEU under the Federal Workplace Relations Act 1996, with over 120,000 members, one of the largest in Australia. The Division covers several industries including the coal industry, coal ports, metalliferous mining industries, electrical power generation, oil and gas and the Nation's small coking industry.

The Northern District Branch of the CFMEU Mining and Energy Division, being the branch that on behalf of the organisation which is making the submission is the principal Union representing coal miners in the Northern District coalfields of New South Wales. The Integra Complex with its site approximately 10 kilometres north-west of Singleton, in the locality of Camberwell is wholly within the State's Northern District coalfields.

The Union is familiar with the Ravensworth Integra Mine Complex site and engaged the services of an Environmental Consultant with extensive experience in local government and environmental assessments on coal mining related projects.

After reviewing all the material and taking advice, the Union supports on balance the proponent's application for Modification 2 Integra Overland Conveyor and Biodiversity Offset Project.

Project Overview

The proposed modification comprises:

- Removal of Schedule 3 Condition 48, which requires the installation and operation of an overland conveyor from the underground surface facilities to the Coal Handling and Preparation Plant.

The intention of the proposed modification is that the current truck hauling arrangements will continue and that the conveyor stipulated in the approval condition not be built. The timeframe for construction of the conveyor has been extended by previous approvals to enable further assessment of the benefits and costs of the overland conveyor to be undertaken.

The construction of an overland conveyor was initially proposed within the Surface Facilities Project application 06-0057. The conveyor was considered to provide environmental benefits through an associated reduction in noise and air quality impacts from cessation of truck haulage of ROM coal between the Underground surface facilities and the CHPP.

Subsequent feasibility assessments of the overland conveyor system and associated infrastructure have estimated the cost to design and construct the conveyor; infrastructure upgrades and CHPP interface at approximately \$95 million. This is primarily due to the geotechnical and engineering constraints associated with building on unconsolidated overburden areas, the avoidance of existing mine infrastructure and the required upgrade of existing infrastructure. Further cost assessments failed to reduce the capital cost for the overland conveyor and CHPP interface. Therefore, the conveyor construction is not considered economically viable. In addition, the construction of the overland conveyor is likely to result in significant disruption to existing operations.

- Amendment to the definitions of “Day” and “Night” in Schedule 1 to enable the operations within the North Open Cut (NOC) to be carried out for the period from 7am to 10pm Monday to Sunday and Public Holidays in place of the currently approved 7am to 10pm Monday to Saturday, and 8am to 10pm Sunday and Public Holidays under Schedule 2 Condition 11 (a).

This minor amendment to operating hours for the NOC will better align staff shift rosters. Shift rosters on Sundays' commence at 7am; however, under the current arrangement personnel are unable to commence work until 8am. Consistent starting times across the week will allow for an improvement in operational outputs and reduction of inefficiencies.

- Amendment to Table 6 in Schedule 3 Condition 7 “Land where additional noise mitigation measures are available on request” to include “363 – D & L Bynon”;

Landowners, government agencies and the community have an expectation that landowner details are accurate in project approval documentation.

- Amendment to the night time rating background level (RBL) for receptor ID 112; and
- Amendment to Schedule 3 Condition 43, to extend the timeframe for the long-term security of all areas in the revised offset strategy from September, 2012 to September, 2014.

Exploration activities, undertaken since the NOC and associated offset strategy was approved have identified a significant coal measure under the Northern, Western, and Supplementary Offset Areas. This resource contains approximately 35 Mt of semi-soft coking coal and 8 Mt of thermal coal which has estimated revenue of \$6.2 billion. Long term security of biodiversity offset areas, as required under Schedule 3 Condition 43 of the Project Approvals, would result in the sterilisation of this resource meaning that the future mining of this resource would be prevented.

Revision of the biodiversity offset strategy would also give Integra the potential to improve the associated biodiversity conservation values. Participation in the Upper Hunter Strategic Assessment will allow for an improved biodiversity conservation outcome on a regional scale and an improved selection process for offset areas.

The modifications proposed, taken collectively, will constitute Modification 2 to the Integra Mine Complex Project Approvals.

Stakeholder Engagement

The proponent indicates a comprehensive stakeholder engagement strategy currently exists for the Integra Complex.

The proposed modifications were discussed at CCC meetings held on 15 November 2011, 7 February 2012, 1 May 2012 and 1 August 2012. The feedback received from these meetings relevant to the proposed modifications related to the timing of the EA's public exhibition, the opportunity for the community to gain information and comment on the proposal as well as potential loss of local biodiversity offset areas.

As a result of this feedback, the proponent held a community information session in Singleton on 9 August 2012 to provide community members with information regarding the proposed modification, an opportunity to ask any questions and provide feedback on the proposal and other general matters related to the Complex. Feedback was also received from community members unable to attend the session by phone. Approximately 20 people attended the session and a further eight people provided feedback over the phone.

Matters raised during the information sessions and individual feedback included:

- Additional dust and noise impacts resulting from continued road haulage.
- Ongoing management of the current biodiversity offset areas.
- Additional noise impacts resulting from an increase in NOC's operating hours.
- EA public viewing and timeframe for making submissions on the proposed modification.
- Mining of resource identified beneath current biodiversity offset areas.
- Mine related impacts not specifically related to the proposed modifications.

Noise

The elements of the proposed modification which have potential noise impacts include the continued road haulage of ROM coal from the Underground facilities to the CHPP, the change in operating hours to allow an additional hour on Sunday's (and public holidays) and identification

of ID 363 as a receptor. It is also noted that during the course of the noise study, the night time RBL for receptor ID 112 was reassessed.

Acoustic assessment of the proposed continuation of ROM coal haulage, change in operating hours, and changes to vacant land boundaries have been reviewed and compared against current emissions from the Complex.

Continued Road Haulage

Integra is seeking to remove Schedule 3 Condition 48 of the Project Approvals which requires the installation and operation of an overland conveyor from the Underground surface facilities to the CHPP. The alternative to the conveyor system would be the continued use of the Complex's RL100 haul road.

The results of the comparison between either haul road or conveyor methods of transport when combined with the open cut emissions indicate that, for the majority of receptors, there will be a negligible noise increase. This is due to the insignificant noise contribution of these sources compared to the overall noise level of other Open Cut and Underground associated plant.

The results of comparisons identified that generally, the haul road scenario would generate noise levels 2 dBA to 3 dBA higher than the conveyor scenario at western receptors. However, with the incorporation of a proposed 3m bund wall, noise emissions from trucks on the haul road would be negated. This bund wall has now been constructed by Integra, and therefore, increased emissions at western receptors negated. Additionally, the removal of the conveyor scenario would see decreases in noise levels for receptors situated in locations NAG 10 and potentially NAG 9. However, this decrease would be no more than 1 dB which is an imperceptible difference and, therefore, it is considered there is no significant difference in noise impacts between the conveyor and continued truck haulage.

The proposed modification, as mitigated, will not result in the addition of privately owned receptors within the Project's acquisition and management zones.

The anticipated noise contribution from the haul road component would remain 10 dB(A) or more below the current noise levels within Camberwell Village, and therefore, there is no predicted increase to cumulative noise at Camberwell Village.

Changes to Operating Hours

Integra is seeking an amendment to the Project Approvals to enable operations within the NOC to occur from 7am to 10pm Monday to Sunday, and public holidays in place of the currently approved 7am to 10 pm Monday to Saturday, and 8am to 10pm Sundays and public holidays.

Analysis of the hour from 7am to 8am weekdays compared to the 7am to 8am on Sundays demonstrated that background noise levels are identical for receptor IDs 20 and 48, and otherwise comparable for receptor ID 31 (within 1 dB).

Additionally analysis of ambient $L_{eq} (15min)$ levels for barn owl charts for the three receptors between 8am to 8am weekdays compared to the 7am to 8am on Sundays similarly reflects the consistent trend of the background noise levels. Furthermore, analysis noted that night time levels are significantly lower than during the morning with levels, increasing typically at 6am which is consistent with expected day-to-day rise and fall of noise levels, demonstrating some influence from local traffic noise.

With respect to the proposed modification to the Project Approvals to operate on Sunday and public holidays prior to 8am indicates that ambient and background noise in the hour prior to 8am on Sundays is consistent with the weekdays. If approval was granted to operate between 7am and 8am on Sundays and public holidays, a morning shoulder is deemed applicable.

Applying the shoulder period mid-point of determining RBL between day and night as per the INP, would provide suitable limits for the assessment of receptors. As there are minimal variations between the day and night noise criteria for all receptors surrounding the Complex, the period limits will be consistent with current day and night limits.

Vacant Land Changes

Integra is seeking to update Table 6 “Land where additional noise mitigation measures are available on request” in Schedule 3 Condition 6 of the Project Approvals to include receptor ID 363. Vacant land ID 363 is now recognised as a receptor and was assessed against the modelling undertaken for the Open Cut EA.

Receptor ID 53 was identified as being subject to additional noise mitigation measures on request due to cumulative noise impacts at this receptor exceeding INP acceptable amenity criteria.

Rating Background Level Review

A review of the night time RBL calculated for the Open Cut Project EA at receptor ID 112 was requested by DP & I. The review was to include consideration of whether:

- Excess morning traffic on the nearby New England Highway has increased the night time RBL; and
- Operations at the Complex have been excluded.

The results of the review indicated that traffic noise from the New England Highway during the morning shoulder period did not elevate the night time RBL at the Ernst property. At receptor ID 112, the lower 10th percentile of the night period occurs during early morning hours not between 5am to 7am and, therefore, excluding these two hours has not influenced the results.

Given accepted field measurement tolerances of 2 dB, it is considered that the analysis and findings are not inconsistent with the findings of the Open Cut Project Noise Impact Assessment.

In addition, noise levels at receptor ID 112 as a result of operations at the Complex were predicted to be no more than 45 dB(A). Further Independent Review in 2011 assessed the noise levels at this property from the Complex to be lower than the levels predicted by consultants Heggies (2009). Therefore, despite the decrease, the acquisition criterion at receptor ID 112 is not exceeded. Receptor ID 112 is currently subject to noise mitigation measures on request.

Air Quality and Greenhouse Gas

The only proposed modification that would potentially have an impact on air quality and GHG is the removal of the requirement under Schedule 3 Condition 48 of the Project Approvals to install and operate an overland conveyor from the Underground surface facilities to the CHPP. The approval of this proposed modification would mean the continued use of the road haulage system rather than an overland conveyor. Identification of ID 363 as a receptor is not considered to have an impact on air quality however has been considered in this assessment.

A review of dust emissions arising from the continuation of hauling ROM coal from the Underground operations at the Complex shows that the estimated dust emissions are negligible relative to the total emissions from the Complex.

Only two private receptors (ID 47 and ID 110) are predicted to experience an exceedance of any of the air quality criteria's as a result of the continuation of haulage when using the default emission factor and only one private receptor (ID 47) using the AP-42 emission factor. Both these receptors are currently entitled to acquisition and additional mitigation measures upon request. Cumulative impacts as a result of continued haulage are predicted to have negligible impacts in Camberwell Village and other receptors. Management of air quality at these and other receptors will continue to be undertaken in accordance with the Complex's air quality management practices.

Air quality monitoring data in the vicinity of the site, which includes the impacts of dust emission generated from the current hauling of ROM coal from the Underground, has generally demonstrated compliance with all relevant criteria.

The proposed modifications would result in a minor reduction in project related GHG emissions.

It is concluded, that the continuation of hauling ROM coal from the underground operations would not cause any discernable change to dust levels in the area, relative to the approved operations at the Complex as a whole.

Other Environmental Considerations

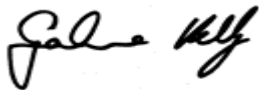
The main environmental impacts that would result from the proposed modification have been considered, those being noise and dust. The other environmental, social and economic aspects which require consideration were assessed and are projected to be negligible to none at all.

In Summation

The detailed EA for the Overland Conveyor and Biodiversity Offset provides details of negligible anticipated environmental impacts. This Project is also not anticipated to have any adverse impacts upon the social and/or economic fabric of the local area or the wider Hunter

Valley. Participation in the UHSA will allow for an improved biodiversity conservation outcome on a regional scale and an improved selection process for offset areas. The Project does not pose any notable social impacts over and above those previously assessed and approved under Project Approval.

The Union, therefore, on balance supports the proponents Modification 2 application and asks for the Modification to be approved.

A handwritten signature in black ink, appearing to read "Grahame Kelly". The signature is written in a cursive, slightly slanted style.

Grahame Kelly
DISTRICT SECRETARY