



Maules Creek Coal Mine

Employee Transport Modification Responses to Submissions

MAULES CREEK COAL MINE
EMPLOYEE TRANSPORT MODIFICATION
RESPONSES TO SUBMISSIONS



AUGUST 2016
Project No. WHC-15-30
Document No. 00756930.docx

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1 INTRODUCTION

An Environmental Assessment (EA) has been prepared for a proposed modification to the Maules Creek Coal Mine (MCCM), an open cut coal mining operation which operates in accordance with Project Approval 10_0138.

The MCCM is located approximately 50 kilometres (km) north-northeast of Gunnedah in New South Wales (NSW) (Figures 1 and 2). The MCCM is a joint venture between Aston Coal 2 Pty Limited (a wholly owned subsidiary of Whitehaven Coal Limited [Whitehaven]) (75 percent [%]), ITOCHU Corporation (15%) and J-Power Corporation Pty Limited (10%). The MCCM is managed by Maules Creek Coal Pty Ltd (MCC), a wholly owned subsidiary of Whitehaven.

The Maules Creek Employee Transport Modification (the Modification) is sought under section 75W of the NSW *Environmental Planning and Assessment Act, 1979* (EP&A Act).

The EA was placed on public exhibition by the NSW Department of Planning and Environment (DP&E) from 23 June 2016 to 7 July 2016.

The DP&E has requested that MCC review and respond to the submissions that were received on the EA.

Table 1 provides a reconciliation of the submissions received from State and Local Government agencies and Table 2 provides a reconciliation of submissions received from non-Government organisations (NGOs). Table 3 provides a reconciliation of public submissions. MCC has prepared a response to the issues raised in the submissions. Responses to submissions made by Government agencies are provided in Section 2, responses to submissions made by NGOs are provided in Section 3, and responses to public submissions are provided in Section 4.

Table 1
Reconciliation of Agency Submissions

Agency	Date of Submission
Gunnedah Shire Council (GSC)	1 July 2016
Narrabri Shire Council (NSC)	7 July 2016
Roads and Maritime Services (RMS)	11 July 2016

Table 2
Reconciliation of Non-Government Organisation Submissions

Organisation	Date of Submission	Nature of Submission	Issue ID Number
Maules Creek Country Womens Association (CWA)	Undated	Objection	1, 2, 3, 4, 5, 6, 7, 8, 9, 10.
Wando Conservation and Cultural Centre Inc	Undated	Objection	2, 3, 4, 5, 9, 10, 11.

Table 3
Reconciliation of Public Submissions

Name	Date of Submission	Nature of Submission	Issue ID Number
Dr Kerri Clarke and Ms Anna Christie MCCM Community Consultative Committee (CCC) Environmental Representative and Alternate	Undated	Objection	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11.
Jacqui McInerney	5 July 2016	Comment	2, 5, 9, 10, 12.
Peter Watson MCCM CCC Representative representing Maules Creek Community Council	Undated	Objection	2, 3, 4, 5, 9, 11, 13.
Sally Hunter	5 July 2016	Objection	2, 3, 4, 5, 9, 14, 15.
Name Withheld 1	Undated	Objection	8, 16.
Name Withheld 2	Undated	Objection	8, 16.
Name Withheld 3	Undated	Objection	4, 5.

2 RESPONSES TO GOVERNMENT AGENCY SUBMISSIONS

Responses to issues raised by Government agencies are provided in the subsections below. Of the three submissions by Government agencies, NSC expressed support for the Modification, GSC commented that they did not have issues to raise in regard to the application and RMS requested an amendment to the proposed Project Approval Condition 63, Schedule 3 and details in regard to safe road transport initiatives for site employees. These two issues raised by RMS are addressed below.

2.1 PROPOSED CHANGE TO CONDITION 63

Condition 63, Schedule 3 of the Project Approval (10_0138) contains specific requirements regarding the use of a shuttle bus system to transport construction and operational workers to and from the site. In particular this condition, which is unique to the MCCM, states:

The Proponent shall ensure that construction and operational employees are predominantly transported to the site by shuttle bus, consistent with the assumptions used in the traffic study undertaken for the EA. Note: The EA assumed that 90% of construction employees and 90% of operational workers based on peak travel movements would be transported to site by shuttle bus from Boggabri township. However, the shuttle bus service could also operate from Gunnedah and Narrabri.

Specifically, the amendment of Condition 63, Schedule 3, sought in the EA is as follows:

The Proponent shall ensure that a shuttle bus service is available to facilitate the transportation of construction and operational employees to site. MCC will target that 70% (averaged over a week) of the operations, maintenance and CHPP wages employees would utilise the bussing service. are predominantly transported to the site by shuttle bus, consistent with the assumptions used in the traffic study undertaken for the EA. Note: The EA assumed that 90% of construction employees and 90% of operational workers based on peak travel movements would be transported to site by shuttle bus from Boggabri township. However, the shuttle bus service could also operate from Gunnedah and Narrabri.

RMS has stated:

Roads and Maritime objects to the proposed amendment, as submitted. Whilst Roads and Maritime is prepared to support a reduction in the requirement from 90% to 70% of employees using the shuttle bus provided, the use of the word 'target' is not subscribe. The condition, as worded, could be satisfied irrespective of the percentage of employees actually using the service.

The proposed change to the wording of Condition 63 was provided in the EA as a suggestion for the revised wording of the condition. It is noted by MCC that the EA would be exhibited, providing opportunity for government agencies and members of the public to comment on the proposed wording; which would ultimately be determined by the Secretary of the DP&E, should the Modification be approved.

Accordingly, MCC agrees to change of the word "target" to "ensure" in order to address RMS's comment. Subsequent to the submission from RMS, Whitehaven has consulted further with RMS regarding the wording of the condition and understands that RMS no longer objects to the proposed change to Condition 63.

2.2 EXISTING SITE ROAD TRANSPORT INITIATIVES

RMS requested further information about initiatives that are currently undertaken on-site with respect to road transport and safety.

The EA describes a free bus service that MCC provides to its employees to and from Boggabri, Narrabri and Gunnedah. Some 70% (averaged over a week) of operations, maintenance and CHPP wages employees use this service.

For employees who travel to site in light vehicles, driver behaviour requirements are described in the MCCM Traffic Management Plan (MCC, 2014). These requirements are summarised in the sub sections below.

2.2.1 Driver Education

Road transport safety is addressed as part of the MCCM site specific induction, toolbox talks, and safety alerts. This includes discussion of the Code of Conduct (Section 2.2.3), driving to environmental conditions (such as fog, rain etc), safe following distances and caring for any injured wildlife.

2.2.2 Managing Driver Fatigue

Fatigue is a potential issue for employees finishing their shift and subsequently driving home via the public road network. This is in-part managed by the availability of the free bus service, however there are occasions where self-driving is required (as described in the EA). Where driving is required, car pooling is encouraged by capping the availability of on-site car parking.

Additional fatigue management aspects on the road network include:

- requirement to stop at the MCCM security hut on the access road, which provides an opportunity for interaction with security staff to assess levels of alertness;
- Whitehaven's Fitness for Work policy, which includes measures to ensure that employees are physically, mentally and emotionally capable to perform their duties safely; and
- Whitehaven's fatigue management policy, which includes consideration of travel time when calculating "hours worked" for the purposes of the policy.

The transport contractors engaged for delivery of site equipment and materials are required to have a driver fatigue management procedure as part of the driver induction process for all employees. Drivers on long haul consignments are encouraged to plan their trips to make use of safe stopping locations for resting.

2.2.3 Code of Conduct

In relation to those drivers who do not use the free bus service, all drivers of light and/or heavy vehicles that have been engaged by MCC must adhere to the following *Code of Conduct for Drivers*:

- Obey all the laws and regulations that apply to vehicles on public and private roads;
- Operate in full compliance with this Traffic Management Plan;
- Respect the rights of others, including drivers and pedestrians, to use and share the road space;
- Maintain a safe following distance between vehicles;
- Ensure that the vehicle is clean and in good mechanical condition to reduce environmental impacts;
- Not travel in convoys unless under approved escorts;
- Following the designated access routes for the MCCM;
- Abide by all NSW and interstate road rules and vehicle regulations;
- Ensure high level of courtesy; and
- Turn off Flashing/rotating beacons when on public roads.

The Code of Conduct as indicated above forms part of the contractual arrangements for transportation of goods to the MCCM entered into by MCC. Employees and contractors are reminded of the Code of Conduct frequently via various information forums such as driver inductions, training, toolbox talks and safety briefing notifications. The code is reviewed as part of the MCCM Health Safety Management System.

3 RESPONSES TO NON-GOVERNMENT ORGANISATIONS AND PUBLIC SUBMISSIONS

Two objections were received from non-government organisations (Maules Creek CWA and Wando Conservation and Cultural Centre Inc) and responses to issues raised are provided in Table 4. The comments and issues raised in submissions received from members of the public are also addressed in Table 4. Of the six submissions by members of the public that were received by DP&E, five submissions objected to the Modification and one provided comments. A reconciliation of which issues were raised in each submission is provided in Tables 2 and 3.

Table 4
Responses to Non-Government Organisation and Public Submissions

Issue ID Number	Subject	Issue Raised	Response
1	Legislative Requirements	Concern was raised regarding whether Section 79C of the EP&A Act is appropriately addressed in the Modification.	Although Part 3A of the EP&A Act was repealed on 11 October 2011, the Maules Creek Coal Project remains a “transitional Part 3A project” under Schedule 6A of the EP&A Act. The proposed Modification is therefore being considered under Section 75W of the EP&A Act, in accordance with the relevant savings provisions.
2	Proposed Wording Of Condition 63	Concerned was raised regarding the proposed revised wording of Condition 63.	This is addressed in Section 2.1.
3	Biodiversity	Concern was raised regarding the potential for the Modification to impact on previously identified biodiversity corridors. In particular, these submissions suggest that the Modification would increase road transport movements which would in turn result in additional incidents of vehicular fauna strike along the Maules Creek Coal Mine access road. The issues raised include discussion of the Maules Creek Coal Mine access road traversing an east-west biodiversity corridor, leading to potential for vehicular fauna strike.	It should be noted that the approved <i>MCCM Revised NSW Biodiversity Offset Strategy</i> (Whitehaven, 2015) (endorsed by OEH) identified that the east-west biodiversity corridor is located to the west of the Maules Creek access road; hence it is an incorrect assertion that the access road traverses the approved east-west biodiversity corridor (Plate 1).

Table 4 (Continued)
Responses to Non-Government Organisation and Public Submissions

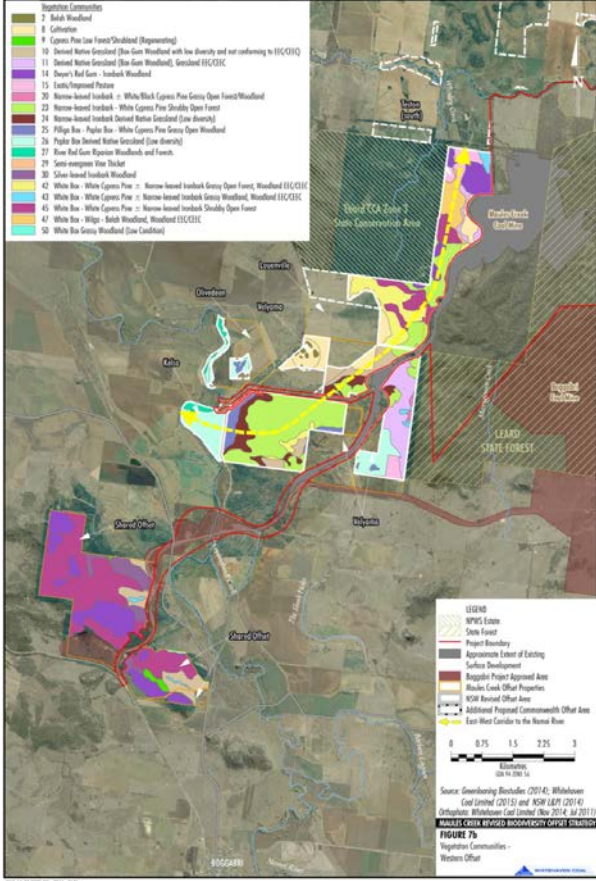
Issue ID Number	Subject	Issue Raised	Response
3	Biodiversity		 Vegetation Communities 1. Bush Woodland 2. Callitriche 3. Capeweed Pine (see Forest/Shrubland) (Regeneration) 4. Disturbed Native Grassland (See Grass Woodland) with low diversity and not conforming to HSCCH 5. Disturbed Native Grassland (See Grass Woodland), Grassland HSCCH 6. Dyer's Red Gum - Jarrah Woodland 7. Exotic/Invasive Plantation 8. Native Jarrah Woodland 9. Native Jarrah Woodland - White/Black Capeweed Pine Grass Open Forest/Woodland 10. Native Jarrah Woodland - White Capeweed Pine Shrubby Open Forest 11. Native Jarrah Woodland Disturbed Native Grassland (See diversity) 12. Pilgah Pine - Pilgah Pine - White Capeweed Pine Grass Open Forest/Woodland 13. Pilgah Pine Disturbed Native Grassland (See diversity) 14. River Red Gum Riparian Woodlands and Forests 15. Semi-deciduous Pine Shrub 16. Silver Jarrah Woodland 17. White Box - White Capeweed Pine - Native Jarrah Woodland Grass Open Forest, Woodland HSCCH 18. White Box - White Capeweed Pine - Native Jarrah Woodland Grass Woodland, Woodland HSCCH 19. White Box - White Capeweed Pine - Native Jarrah Woodland Shrubby Open Forest 20. White Box - Wilga - Jarrah Woodland, Woodland HSCCH 21. White Box Grassland (See Condition) LEGEND - NPWS Estate - State Forest - Project Boundary - Approximate Extent of Existing Surface Development - Requisite Project Approval Area - Requisite Project Approval Area - NSW Revealed Offset Area - Additional Proposed Commonwealth Offset Area - East-West Corridor to the Native River Scale: 0 0.75 1.5 2.25 3 Kilometres Source: Greening Australia (2014); Whitehaven Coal Limited (2015) and NSW LEP (2014) Orthophoto: Whitehaven Coal Limited (New 2014, Jul 2011) MAULES CREEK REVISOR BIODIVERSITY OFFSET STRATEGY FIGURE 7b Vegetation Communities - Western Offset

Plate 1 – Western Offsets Figure in approved Revised Biodiversity Offset Strategy (Whitehaven, 2015)

Table 4 (Continued)
Responses to Non-Government Organisation and Public Submissions

Issue ID Number	Subject	Issue Raised	Response
3	Biodiversity		It should also be noted that the MCCM access road is located within an existing infrastructure corridor, which includes the access road, rail spur, powerlines, a power substation and water pipelines. This results in a discontinuity between vegetated areas either side of the infrastructure corridor which increases the visibility of motorists and likely reduces the usage of the infrastructure corridor by fauna (i.e. the infrastructure corridor is approximately 60 m wide at its narrowest). The Maules Creek Coal Project EA Ecological Impact Assessment (Cumberland Ecology, 2011) assessed the potential for fauna strike as follows: 4.3.5 Vehicle Strike <i>Vehicle strike can pose a significant risk to some wildlife, particularly but not exclusively ground dwelling species (Taylor and Goldingay, 2010). While some mobile species, such as birds, have the potential to move away from the path of clearing, other species that are less mobile, or those that are nocturnal and restricted to tree hollows, may have difficulty moving over relatively large distances. Pre-clearance surveys however, are likely to reduce the risk of mortality during clearing.</i> <i>The Project will result in the construction of some additional roads and tracks which means an increased length of road for animals to cross and negotiate, as well as an increase in the number of vehicles operating in the Project Boundary. These changes are likely to increase the extent of vehicle strikes on native fauna, with an associated increase in mortality.</i> <i>This is likely to be most significant during the construction phase, when vegetation and habitats are being cleared. This may also occur during the operation of the mine as a result of collision with vehicles entering and leaving the pit as well as during the normal daily movements of workers and vehicles throughout the site.</i> <i>Although some mortality of animals as a result of vehicle strike is likely, it is not expected to be significant. The majority of the roads within the Project Boundary would not be able to be traversed at high speed due to the terrain, and animals are expected to be able to avoid vehicles. Appropriate signage and careful driving policies will increase the awareness of drivers and decrease the risk further.</i> <i>The risk of vehicle strike will diminish as areas that are progressively rehabilitated will return to current levels following rehabilitation of the total mined area and cessation of mining.</i>

Table 4 (Continued)
Responses to Non-Government Organisation and Public Submissions

Issue ID Number	Subject	Issue Raised	Response
3	Biodiversity		Although the Modification would result in an increase in vehicle movements relative to levels described in the Maules Creek Project Coal EA, the increase in movements relative to those that are occurring currently are not pronounced (maximum of 462 movements per day compared with 395 in June 2015). MCC currently manages potential vehicular fauna strike at the existing MCCM by: • installation of appropriate signage on the MCCM access road (refer to Plates 2 and 3); and • advertisement of a phone number that can be used to report vehicular strikes.  Plate 2 – Maules Creek Coal Mine Access Road Signage  Plate 3 – Maules Creek Coal Mine Access Road Signage

Table 4 (Continued)
Responses to Non-Government Organisation and Public Submissions

Issue ID Number	Subject	Issue Raised	Response
3	Biodiversity		Therefore, it follows that potential impacts of the Modification on biodiversity values are negligible because the Modification would: - not result in any additional vegetation clearance; and - not change any existing/approved initiatives to improve biodiversity values e.g. offset areas; and would not materially change vehicular strike potential.
4	Road Transport	Concern was raised that the safety of motorists on the public road network would be compromised.	Level of Service (LOS) is defined as a qualitative measure describing the operational conditions within a traffic stream as perceived by drivers and/or passengers. A LOS definition generally describes these conditions in terms of factors such as speed and travel time, freedom to manoeuvre, traffic interruptions, comfort, convenience and safety. The LOS was analysed by GTA Consultants in Appendix A of the EA. This included composition of previous road traffic count data which was augmented by targeted surveys and modelling of the influence on traffic associated with the Modification. This analysis showed that no changes in the existing LOS were anticipated as a result of the Modification. As a consequence, no specific measures would be required to mitigate or minimise implications of the Modification with regard to the capacity, efficiency and safety of the road network (GTA Consultants, 2016).
5	Road Transport	Concern was raised that the reduction in the use of buses would lead to poor driver behaviour including driver fatigue, unsafe overtaking, employees driving in columns/convoys, speeding and travelling in large volumes.	Issues are addressed in Section 2.2, including the driver's code of conduct and driver education initiatives.
6	Road Transport	Concern was raised that some traffic count locations on local roads north of the MCCM were not considered in the Road Transport Assessment and that the omission resulted in the Narrabri Mine not being considered.	Data were previously collected for the Maules Creek Coal Project EA for local roads to the north of the MCCM (M06, M07, M08 and M11). Subsequent to the Maules Creek Coal Project EA, a key Project Statement of Commitment (SOC 29) was proposed by MCC to prevent use of Harparary Road by MCC employees: <i>Reasonable endeavours will be made to ensure that Project related traffic does not utilise the following public roads unless they are travelling to a specific destination along that route (such as residence, monitoring location, near neighbour etc.): Harparary Road from Leard Forest Road to the Kamilaroi Highway; Leard Forest Road between Northern Loop Road and Harparary Road; Therribri Road between the Mine Access Road and Harparary Road and the entire length of Browns Lane.</i> Therefore, potential impacts on the road network for traffic travelling north are provided at location M01 (Kamilaroi Highway North). This includes traffic to and from the Narrabri Mine (i.e. the Kamilaroi Highway traffic includes cumulative traffic from Narrabri Mine).

Table 4 (Continued)
Responses to Non-Government Organisation and Public Submissions

Issue ID Number	Subject	Issue Raised	Response
7	Road Transport	Concern was raised that road transport movements associated with the MCCM would coincide with school bus pick-ups/drop offs.	Potential interactions with school buses are discussed in Section 3.13 of Appendix A of the EA (GTA Consultants, 2016): <i>School buses operate on several of the roads which are used by vehicles travelling to and from the Maules Creek Mine, primarily along Kamlaroi Highway.</i> <i>Hopes Bus Service runs the Willala Bus Service which starts and ends in Gunnedah and travels to Willala. The morning service operates between 6.10am and 9.00am, and the afternoon service operates between 2.55pm and 5.45pm.</i> <i>Two school bus services are operated by GJ & SJ Haire Warragrah Bus Service. The Boggabri Primary School Service starts and ends in Boggabri and operates between 7.20am and 9.05am, and between 2.50pm and 4.45pm. The Boggabri to Gunnedah High School service operates from Boggabri starting at 7.40am and ending in Gunnedah at 8.35am. In the afternoon, it starts in Gunnedah at 3.15pm and ends at Boggabri at 4.15pm.</i> <i>The Blue Vale School Bus Service operates a school bus service along Blue Vale Road.</i> <i>The MW & JA Roy Bus Service operates the Wallah Road Bus Service, which starts at Narrabri and operates to Harparary Road, Maules Creek Road, Browns Lane, Old Gunnedah Road and then returns to Narrabri. It also operates the Davis Nursery to Narrabri School Bus Service, which starts at Narrabri, and operates along Leard Forest Road, Black Mountain Creek Road, Old Gunnedah Road and returns to Narrabri.</i> <i>To manage the potential for interaction between school bus operations and mine-related traffic, the Maules Creek Coal Mine TMP [Traffic Management Plan] indicates that management will continue to liaise with the local school bus operators to assist in:</i> <i>identifying bus routes and operating times, as well as pick up and drop off points for school children, to allow truck consignors to actively avoid those times where practical and to advise contractors (including shuttle bus drivers) on the safe driving practices required as part of the Maules Creek Coal Mine operations;</i> <i>include a review of school bus pick up and drop off times along the main access routes in close proximity to the mine when developing shift change over times at Maules Creek Coal Mine; and</i> <i>establishing mutual understanding and courtesies to minimise potential conflicts between the bus and mine operations.</i> <i>Shift changes over times are typically timed to avoid the main operating times for the school buses. Morning bus services generally operating later than the times at which the majority of Maules Creek Coal Mine workers would be travelling on the road network. Afternoon school buses typically operate earlier than the times at which the majority of Maules Creek Coal Mine workers would be travelling.</i> <i>Some of the school bus routes vary times, routes and services in response to the changing student population, which is acknowledged in the TMP, with management undertaking to consult with the bus services operators on a regular basis.</i>

Table 4 (Continued)
Responses to Non-Government Organisation and Public Submissions

Issue ID Number	Subject	Issue Raised	Response
8	Road Transport	Concern was raised regarding the assumption in the EA of Boggabri Coal using its approved 'left in, left out' intersection on the Kamilaroi Highway and that the MCC should use this road once commissioned to reduce the use of Therribri Road.	Use of the Boggabri Coal Mine's approved access road is discussed in Section 4.5 of Appendix A of the EA (GTA Consultants, 2016): <i>It is also noted that Idemitsu (proponents of Boggabri Coal Mine) is also proposing a new access road directly off the Kamilaroi Highway to its current access road, which may serve to mitigate impacts on the local road network (Hansen Bailey, 2013). In accordance with Boggabri Coal Mine's Condition 59, Schedule 3 of Project Approval 09_0182), the intersections are to be constructed to the requirements of RMS.</i> <i>It is further assumed that by 2020, the alternative access for the Boggabri Coal Mine directly from Kamilaroi Highway would have been completed and commissioned, such that a significant proportion of the traffic travelling to and from the Boggabri Coal Mine would enter and exit directly to and from the Kamilaroi Highway. Based on the distribution of Boggabri Coal Mine operational traffic estimated by Parsons Brinckerhoff, 70 percent would use the new access directly to and from Kamilaroi Highway. Assuming that the existing Leard Forest Road access remains open, 30 percent would continue to use the Leard Forest Road access as they would be approaching and departing to and from the east.</i> The Road Transport Assessment (Appendix A of the EA) scenarios in 2015 (with Boggabri Coal Mine using the existing intersection) and 2020 (with Boggabri Coal Mine using its proposed intersection). It is noted that the midblock LOS are all 'A' (the highest level of service) in 2015 with the existing intersection assumed to be in place. GTA Consultants has also undertaken an analysis for 2020 on local roads and intersections in the event that Boggabri Coal Mine's new intersection is not used as is currently approved. This analysis shows that the LOS on Therribri Road, Rangari Road or the intersection of Rangari Road and the Kamilaroi Highway would be the same under the Modification as with the approved 'left in, left out' intersection. MCC has an option to use the Boggabri 'left in, left out' intersection and would consider exercising this option once the intersection is commissioned consistent with Boggabri Coal's Project Approval.

Table 4 (Continued)
Responses to Non-Government Organisation and Public Submissions

Issue ID Number	Subject	Issue Raised	Response
9	Justification of the Need for the Modification	Concern was raised by the Maules Creek CWA that the Modification is not sufficiently justified.	Concern was raised that the Modification is not sufficiently justified. This issue is addressed in the points below. The justification for the proposed changes to the existing Condition 63, Schedule 3 is expanded in the points below: - The need for the Modification is driven by the prevalence of a locally residing workforce: 75% of Whitehaven employees reside in the local towns and rural areas, whereas the Maules Creek Coal Project EA anticipated that the MCCM workforce would predominantly be sourced from outside of the local area and reside temporarily at workers accommodation facilities. - This percentage is expected to increase over time as new employees move to the local area and reside permanently. - Whitehaven believes this is beneficial to the local area as it results in additional families and permanent residents who contribute to the social and economic wellbeing of the area. - Free bus services are provided for Whitehaven employees, however for some of the permanent residents, car pooling or self-driving is more convenient than using these services. - The workforce includes many specialised contractors who attend site with their own tools and equipment, therefore requiring access by private or tool of trade vehicle rather than via the bus services. - There are no material road transport implications: - No material change in the level of service on local roads or perceived change by motorists. - No effects on the levels of service of key intersections.
10	Economics and Employment	Concern was raised that the existing bus service would be discontinued which would impact on employment of bus drivers.	MCC would continue to offer free bus services to Boggabri, Gunnedah and Narrabri. Therefore, employment opportunities for bus drivers would be unaffected by the Modification.

Table 4 (Continued)
Responses to Non-Government Organisation and Public Submissions

Issue ID Number	Subject	Issue Raised	Response
11	Consultation	Concern was raised that the CCC was not consulted.	It is noted that submissions acknowledge that: <i>...a letter detailing the application to modify the operating conditions regarding transport was emailed to CCC members on the 20th June from CCC Chair John Turner, who had received the email from the company on the 31st of May.</i> This is consistent with the EA, which states: <i>MCC wrote to the Community Consultative Committee (CCC) in May 2016 regarding the Modification.</i> Further engagement with the CCC and other members of the public has occurred through exhibition of the Modification and the opportunity to provide written submissions to the DP&E. In addition, MCC held a public meeting in Boggabri in July 2016 including residents of Therribri Road, two CCC members and the bus contractors. The justification for the Employee Transport Modification and associated potential Road Transport impacts were discussed. MCC will provide CCC members with a copy of the Responses to Submissions once finalised.
12	Impacts on Boggabri Township	Concern was raised regarding transport and noise issues in Boggabri township associated with road transport.	The Modification would not increase traffic movements or road noise in the Boggabri township, other than vehicles travelling through the town on the Kamilaroi Highway. This is because employees residing in the town would generate road movements regardless of the mode of transport (i.e. the majority of employees catching the bus service drive to the bus terminus). Thus the resultant potential road noise or safety aspects would not materially change.
13	Greenhouse Gas Emissions	Concern was raised regarding the assessment of greenhouse gas emissions.	Greenhouse gas emissions are assessed in Section 4.4 of the EA: <i>Because of the reduction in use of buses relative to the approved MCCM, the Modification would result in additional use of private light vehicles to access the site relative to the approved MCC. This has the potential to give rise to additional scope 3 (indirect) greenhouse gas emissions associated with the MCCM. However, these emissions would be small compared with other scope 3 emissions (e.g. use of the product coal) and did not warrant specific inclusion in the Maules Creek Coal Project Air Quality Assessment (Pacific Environment Limited, 2011). These emissions would be mitigated by ongoing encouragement of bus transportation and car pooling.</i> Greenhouse emissions would continue to be reported by MCC under the <i>National Greenhouse and Energy Reporting Act 2007</i> (NGER Act).

Table 4 (Continued)
Responses to Non-Government Organisation and Public Submissions

Issue ID Number	Subject	Issue Raised	Response
14	Road Transport	Concern was raised whether the shuttle bus pick-up locations are appropriate.	The existing bus services currently include pick-up and set down locations at Gunnedah, Narrabri and Boggabri. : • Gunnedah – various locations within Gunnedah township • Narrabri – Civeo village. • Boggabri – Civeo village and other locations in the township. These locations will continue to be used and assessed for their suitability with appropriate alternatives identified if concerns are raised regarding current pick up and drop off locations.
15	Road Transport	Concern was raised regarding the potential need for increased road maintenance as a result of the Modification.	Road maintenance contributions by MCC are made in accordance with the general terms in Appendix 3 of the Project Approval 10_0138.
16	Road Noise	Concern was raised regarding road noise impacts on Therribri Road.	Noise on Therribri Road was found to marginally decrease due to a reduction in heavy vehicle movements associated with the Modification. Section 4.3.2 of the EA assesses road noise impacts on Therribri Road: <i>Road noise associated with MCCM's use of Therribri Road was assessed by Global Acoustics (2016) in accordance with the RNP (Appendix B).</i> <i>The focus of this assessment was a privately-owned receiver located approximately 37 m west of Therribri Road. The assessment found that:</i> • <i>Road noise would marginally decrease due to the Modification due to the reduction in heavy vehicle movements.</i> • <i>Daytime peak hour noise would comply with the relevant RNP criteria (55 dBA LAeq(1 hour)).</i> • <i>Night peak hour noise would exceed the relevant RNP criteria (55 dBA LAeq(1 hour)) during the hours of 6:00 am to 7:00 am (i.e. a period where many rural residents are active).</i> <i>Given that Global Acoustics (2016) found a decrease in road noise due to the Modification, no further assessment is considered warranted.</i>

4 REFERENCES

Cumberland Ecology (2011) *Maules Creek Coal Project Ecological Impact Assessment*.

GTA Consultants (2016) *Employee Transport Modification Road Transport Assessment*.

Hansen Bailey (2011) *Maules Creek Coal Project Road Environmental Assessment*.

Maules Creek Coal Pty Ltd (2014) *Traffic Management Plan*.

Whitehaven Coal Limited (2015) *MCCM Revised NSW Biodiversity Offset Strategy*.