



**Wando Conservation and Cultural Centre** is a community organisation based at Maules Creek. Wando is committed to supporting the local community in their continuing effort to protect land, water and air and their right to live in a clean, healthy environment.

WCCC objects to this proposal which imposes yet another burden on the community and impacts on all those travelling the roads involved. At the very least, the building of the Whitehaven Coal-funded Kamilaroi Highway road overpass should be a pre-condition of this modification approval;

Wando's Submission addresses the following:

"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."

This modification has all the hallmarks of a hastily thrown together project driven by Whitehaven's determination to achieve its consented road haulage tonnage through its recent acquisition of a haulage company and an extension of hours of haulage at further cost to the local community and all road users.

The 'public consultation' during the formulation and presentation of this Modification has been completely unacceptable and the local community has been treated with contempt. On April 27, 2023 TM CCC representatives an email from Independent Chair, David Ross, with the attachment 'Tarrawonga Coal Mine- Haulage Hours Modification' and a comment *We can also discuss it at the CCC meeting in May.*

The Final Draft notes of the CCC meeting (yet to be posted on the Mine's website) on 24 May 2023 have:

#### Haulage Hours Modification

AQ then spoke to some slides about the proposed modification. Whitehaven is proposing a modification to PA 11\_0047 to authorise additional road haulage hours on the approved haulage route between the Tarrawonga Mine and the Gunnedah CHPP. This would create no change to noise levels, mine production, or the life of the mine.

MH observed some disparities in information between what CCC members had already received in the past fortnight and what was presented at the CCC meeting, particularly with respect to what hours are being extended.

In addition, MH noted that she had received three different versions of the Traffic Management Plan (TMP). They are supposed to be prepared in consultation with Council. Latest TMP includes the Vickery's Mine plan. Instead, she is seeking only the TMP for Tarrawonga and what is proposed for the modification.

There was then a discussion with respect to additional information required. EOH – The community have a concern about the cumulative impact. Road haulage impacts including Vickery's – what's the increased haulage? MH – Also truck numbers of trucks in and out.

RH – I'm part of the Vickery's CCC – no change in the tonnage going through. Is this modification purely to take pressure off the system?

MH – Has to do with rostering of drivers. WHC has purchased Gunnedah Bulk. Won't WHC staff operate those vehicles?

In evaluating the committee's concerns and confusion in response to the information presented, DR requested that WHC be tasked with a series of actions to be completed in the next week. These actions are:

1. Provide members with no more than half a page clarifying why the modification is necessary.
2. Clarification of the hours proposed.
3. Clarification for NSC with respect to the details of the TMP and which version is relevant.
4. Clarification of Gunnedah Bulk's involvement and why this is necessary.
5. Truck movements in and out and whether these are to change compared to current volumes.

**ACTION 4 – WHC to respond to modification actions within a week.**

AQ: Alison Quiroz, Tarrawonga Mine; MH: Michelle Henry, Narrabri Shire Council; EOH: Elizabeth O'Hara, Community Representative; RH: Cr Rob Hooke, Gunnedah Shire Council; DR: David Ross, Independent Chair

From the draft final minutes it is evident that the representatives of Tarrawonga present at the meeting were not in a position to answer the questions asked and Narrabri Shire Council's receipt of three differing versions of the Traffic Management Plan illustrates our concerns. It was also noted that the published notification failed to indicate an extension of haulage hours on Saturday when this is, in fact, proposed.

In an email dated 29 May, 2023 David Ross circulated the following answers to the questions raised about the modification:

Why the extension of haulage hours? Extension of hours is required to achieve TCMs consented ROM haulage limit of 3.5Mtpa; current hours constrain shift arrangements which affects employment/productivity.

The extension hours for Saturday. One of our members brought to our attention that she had been aware no modification was happening for Saturday hours.

Application is for the following changes in hours:-

Condition Number	Existing Condition	Modified Condition (proposed changes in bold underline)
Cond. 9, Sch. 2	The Proponent shall only transport coal from the site or receive coal reject from the Whitehaven CHPP by truck between the hours of: (a) 6 am to 9.15 pm Monday to Friday; (b) 7 am to 5.15 pm Saturday; and (c) at no time on Sundays or public holidays.	The Proponent shall only transport coal from the site or receive coal reject from the Whitehaven CHPP by truck between the hours of: (a) <b>4 am</b> to <b>11.15 pm</b> Monday to Friday; (b) <b>5 am</b> to <b>7.15 pm</b> Saturday; and (c) at no time on Sundays or public holidays

Is Whitehaven liaising with the council for the hours modification? Yes. Letters of advice regarding Modification have been provided to both NSC and GSC

Will the number of haulage trucks increase because of the hours extension and introduction of Vickery mine? No increase to approved movements as existing consented cumulative haulage limit remains unchanged.

The 'answer' to Question 1 makes no reference to the modifications stated reasons: *primarily due to low availability of road haulage drivers and impacts of flooding events*.

Flooding events are not a current concern and the implication that the existing 'low availability of road haulage drivers' will be engaged for even longer hours causes grave concerns for workplace safety and the safety of other road users.

Question 4 remains unanswered. However, the acquisition by Whitehaven Coal of a trucking company, Bis, which first won a contract to transport coal from Whitehaven's Tarrawonga mine the 40 kilometres to the Gunnedah coal preparation plant, in April 2023 (see Australian Financial Review, 3 April 2023) is fortuitous.

Furthermore, while letters of advice may well have been provided to both NSC and GSC this falls far short of the reciprocal relationship required for 'liaising' and completely omits the community.

Should Whitehaven hope to regain any social license in this community it must begin to treat the community with respect.

The community members represented by Wando Conservation and Cultural Centre:

1. Object to extension of hours increasing the cumulative impacts to all road users;
2. Object to extension of hours not having an end date in this response to what has been highlighted as temporary issues;
3. Object to any extension before the Whitehaven Coal-funded Kamilaroi Highway road overpass is 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;
5. Object to this Modification using longer haulage hours to fix low availability of drivers. It is false logic that additional haulage hours will create more drivers. What it will create is a more dangerous work environment for the existing workforce. Additional pressure will be applied on existing drivers to drive for longer hours. This is dangerous and life threatening, when combined with an increase in traffic from the early commencement of Vickery and longer hours during the beginning and end of the day.

**Recommend:** The flood impacts and workforce shortages identified as justifications for this modification request are temporary impacts. Wando is convinced that adjusting road haulage hours should not be approved. However, should approval be granted it should be as a temporary measure of less than six months within this calendar year and with no extension of approval.

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

It would be an abrogation of Departmental responsibility to permit this modification to proceed.