

22<sup>nd</sup> June 2023

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

**Submission** – Planning Department.

Most of Modifications by this subsidiary company Tarrawonga and the parent company Whitehaven Coal are of considerable concern as they have substantial impacts on our local and surrounding community. The Work Health & Safety record of the Whitehaven company is less than desirable, and this Modification is certainly a WH&S issue.

This Tarrawonga Modification 10 - Road Haulage Hours Modification is of great concern due to driver fatigue with longer haulage hours, both early morning and well into the night. The possibility of serious or even ... deadly consequences should there be an accident along the designated haulage route or worse, at the intersection where the heavily laden coal trucks cross the Kamilaroi Highway.

The lack of the Kamilaroi Highway Overpass which was to be constructed and fully funded by Whitehaven, has never eventuated. For the Tarrawonga Coal mine to continue using the excuse that their truck haulage of coal to the Gunnedah CHPP is 'Temporary' is way past it's use by date!

The local community are well aware that after the approval process of these coal mining companies in the Leard State Forest that there is a continual Modification process which allows the company to just increase all of the original outlined parameters, whether that is ROM tonnage, altering Offsets, Extension of securing Offsets in perpetuity, Depth of extraction, Burial of Off Road Tyres, fleet extensions etc., etc., and now this Tarrawonga Modification 10 - Road Haulage Hours Modification, which in itself tells you that **10 Modifications** since **Approval in 2013** is way past any expectations that were conveyed to the local surrounding community members prior to the Project Approval 11\_0047.

Tarrawonga is saying they need longer hours and less trips, yet they now have trucks that carry an extra 20 tonnes?

There is no rail-line to cart the coal from Tarrawonga & Vickery only more trucks with longer working hours once Vickery Coal comes into production.

1. **I object because:** Road haulage for millions of tonnes of coal per year on our country roads is totally unacceptable.
2. **I object because:** there is No Kamilaroi Highway overpass = No more transport of coal over the Highway until the overpass is built. Tarrawonga (Whitehaven Coal) cannot keep using the excuse that this mode of transport is Temporary!

- **Mandatory consideration - Relevant objects of the EP&A Act**

*"Protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats.*

3. **I object because:** Road kill is more likely due to these extended hours

*“Provide increased opportunity for community participation in environmental planning and assessment.*

4. **I object because:** The community is at a disadvantage when it comes to opportunities to participation in environmental planning and assessment stages. This submission and others that the department receive are always after the major planning has been done without consultation or input during CCC meetings or wider community consultation only at this last stage. We as the community that are impacted by these Major SSD Projects are only afforded comment which may or may not be considered, which shows total disrespect for the local community.
5. **I object because:** there is no time frame as to how long the extended road hours will continue into the future. This cannot be a permanent arrangement which is justified by the company as ‘Temporary’ and ticked off by the Department.

Where is the justification for trucks that haul 20 tonnes more (62 tonnes, instead of 42 tonnes) and a need for extending the haulage hours for an extra 4 hours per day? There doesn’t appear to have been anywhere near the 3.5Mtpa output since Project Approval 11\_0047 was given.

After the May 2023 Tarrawonga CCC meeting the members received a response to the question why Tarrawonga needed to extend their hours: Answer - the extension was required to achieve the consented ROM haulage limit of 3.5Mtpa.

After going through Tarrawonga’s past Monthly haulage tonnes over many years... and Annual Reviews, it seems that even with **“Combined haulage of ROM coal from TCM and Rocglen Coal Mine during 2020 was 2,387,373 tonnes.** (2020 Annual Review)  
Two mines combined and no where near 3.5Mtpa!

6. **I object because:** using heavier laden trucks, with longer haulage hours will almost certainly result in driver fatigue and a critical incident that will ultimately end in a fatality, either of workers or the general public. This is not acceptable.
7. **I object because:** of the Increased traffic when the Vickery mine starts production, this will add to the already dangerous traffic from these coal trucks crossing the Kamilaroi Highway, early in the morning and late in the afternoon.
8. **I object because:** of the increase in the Scope 1 emissions due to the extended hours of these heavy haulage trucks.

How will Scope 1 emissions be reduced, especially when the Vickery mine starts operations and coal haulage by road instead of by train as originally proclaimed?

9. **I object because:** A reduction in the number of heavy 62t laden coal trucks per day should not be used as an excuse to facilitate an approval of this Modification 10. There will be extra impact and degradation of the already flood damaged roads, by heavier haulage loads on tax payer funded shire roads. It is unacceptable that the tax payer bears the damage cost to roads by SSD coal companies.

Longer extended hours also contribute to disruption of the local affected landholders, but as with most mining agreements... money fixes everything. I really hope that these landholders were not harassed or coerced into accepting the deal by Tarrawonga. After all this continuous traffic of heavy haulage vehicles with drivers that have long and tiresome hours will be on these local roads where community members and their loved ones also need to traverse, their safety is at risk.

*“Whitehaven has engaged with government agencies and community including landholders that have dwellings located in proximity to the haulage route to provide an overview of the Modification. Whitehaven has reached private agreements with all but one of the potentially affected landholders, and is in advanced discussions to establish the remaining agreement for the proposed change to the haulage hours.”*

There are bound to be more flood events in the future with the increase of Green House Gas (GHG) emissions and climate change - these extra hours of haulage will be a contributing factor to GHG. Using flooding, and the lack of road haulage drivers being responsible for low haulage tonnes are both poor justifications to increase the haulage hours by 4 hours per day, early morning start of 4am till late at night 11.15pm week days and 5am till 7.15pm Saturdays.

**10. I object because:** When Modifications are submitted to the Department of Planning by a SSD, they are only considered in isolation, not for the cumulative affect that the modification has on the environment or the community. When there are two or more SSD in close proximity then cumulative effects must be considered, and in this case extra heavy road traffic.

Will it take a tragic accident before the Department sees how dangerous this extension of hours in heavier trucks really is? Surly that is not in the public interest.

There must be a Kamilaroi Highway Overpass (fully paid for by Whitehaven Coal) before any further consideration of this or other Road Coal Haulage Modifications by this company is considered.

In the interest of human safety and GHG emissions, this Modification 10 must not be approved. This is not in the public interest.

Sincerely  
Roselyn Druce  
Maules Creek.