



PUBLIC BRIEFING

Whitehaven Coal transport developments

Tarrawonga - Rocglen - Vickery mines

Road haulage intensification in the Namoi Valley

In the quest to capitalise on today's higher coal prices, Whitehaven Coal company is seeking approval to extract increased tonnages of coal from its Tarrawonga and Rocglen mines. A flow-on impact of the additional mining is a phenomenal intensification of road traffic.

This level of traffic will dramatically increase the amount of coal being hauled on public roads at risk to members of the public and also to wildlife. In addition, Wando Conservation and Cultural Centre is of the view that road haulage of coal is uneconomical when externalities like air pollution and carbon emissions are considered.

Already, Whitehaven Coal has pleaded to the NSW Government that it cannot afford to contribute to the Gunnedah Basin Air Quality Monitoring Scheme, as other coal mines in the Hunter Valley do in their region. The company must not be permitted to plead financial difficulties in order to escape its responsibilities.

Whitehaven Coal Limited prepared the Whitehaven Temporary Road Haulage Increase Modification Environmental Assessment for the proposed Whitehaven Temporary Road Haulage Increase Modification that is being assessed under section 75W of the *Environmental Planning and Assessment Act 1979*.

The EA was placed on public exhibition by the NSW Department of Planning and Environment (DP&E) from 20 October to 3 November 2016. The Wando Conservation and Cultural Centre Inc

was unable to lodge a submission against the Modification, owing to the short time-frame. The observations contained in this Briefing document represent the views that would have been contained in such a Submission, had the exhibition period been of a more reasonable length.

Wando Conservation and Cultural Centre has previously spoken out against the proposed intensification of road traffic by Whitehaven Coal, when it objected to another transport modification, the Modification 3 to the Maules Creek mine approval which seeks to reduce safe shuttling of workers in favour of private vehicles. The latter Modification which seeks to abolish the requirement in Clause 63 of the Maules Creek project approval for shuttling, will lead to an **increase in over 500% of vehicles many of whose destination is Gunnedah**, the domicile of a large percentage of Maules Creek mine workers.

MOD 3 has still not yet been approved, yet this new Modification is being rushed through to legitimise Whitehaven's being in breach by 15th November.

This proposal by Whitehaven Coal Mine for a Temporary Road Haulage Increase is slated as having a minimal impact on the existing approval conditions, merely a 14% increase and only 6 additional truck movements per hour, for a temporary period of 2 years.

The Kamilaroi Highway (100km/hr speed limit) is where the impact of this road haulage becomes critical, at the end of Blue Vale Rd the B-double coal truck laden with 42 Tonnes of coal turns left onto the Kamilaroi Highway, then must merge right across one lane in order to turn right several hundred metres later into the Whitehaven CHPP. On return the truck turns left back onto the Highway, merges right across one lane and several hundred metres later repeats the right-turn back into Blue Vale road.

This is a highly stressed section of road, which **over 4000 vehicles travel along each week day. Every 90 seconds on average** a B-double coal truck is entering, merging, and turning right either travelling to or from the coal mines. (GTA 2016 – Table 2.2 Average 40 trips per hour).

But during the traffic survey in August 2016 GTA Consultants (2016) found the actual usage varied considerable and at a peak up to 12% of the daily haulage could occur in a single hour. This equates to up to **74 Coal truck transits of the Kamilaroi Highway in a single hour** (12% of the daily average 612 truck movements per week day) or one B-double coal truck entering, merging and turning right travelling to or from the mine **every 49 seconds**.

The proposal to increase hauled coal from 3.5 mtpa to 4.0 mtpa would require an **additional 11,905 laden coal trips or 23,810 additional truck movements** entering, merging and turning right per year.

(An increase of 500 000T/ with truck carrying 42T per load =11,905 truck movements)

At a peak this 14% increase would result in **85 Coal truck trips per hour** (12% of the projected daily average 700 truck movements per week day) or a coal truck making the risky traverse between Blue Vale Road and Whitehaven CHPP, to or from the mine, **every 42 seconds**.

Summary of information in GTA Consultants Road Transport Assessment (2016)

	Current	Projected *
Average Coal Truck Trips Per hour	40	46
Peak Coal Truck Trips per hour	74	85
Total Traffic (Kamillaroi Hwy) – per day	4185 (1188 Heavy Vehicles) (2010-11 = 3288)	4436 (1379 Heavy Vehicles)
Peak Traffic Per Hour (Kamillaroi Hwy)	AM 296 (81 Heavy Vehicles) PM 333 (76 Heavy Vehicles)	316 (96 Heavy Vehicles) 351 (88 Heavy Vehicles)

- GTA Consultants Road Transport Assessment (2016) states that they assume there will only be a 2% growth in background traffic and 14% increase in Coal Haulage – therefore not taking into account any cumulative impact from other mines in the area- see note on Maules
- Creek Coal Mine Modification 3.

This volume of road haulage was never designed to be a permanent arrangement:

- **January 2013** Tarrawonga was granted approval to temporarily transport up to **2 mtpa** of coal by road to Whitehaven CHPP, this was only meant to be for 2-3 years.
- **September 2014** with the approval of Vickery a cumulative limit of **3.5 mtpa** (for Vickery, Tarrawonga and Rocglen) was set. Above this it was conditional for an overpass being built to take the coal trucks off the Kamillaroi Highway
- **October 2016** Whitehaven want retrospective approval to breach this limit by 14% for 2016 and to continue this in 2017.
- In doing so this is creating an unacceptable risk to public safety and increasing the stress on an already over stressed section of roadway.

Key issues

Tarrawonga and Rocglen increases only if road overpass constructed

Current approval conditions limit the combined output of Tarrawonga and Rocglen mines to 3.5mtpa to be transported by road but increases this to 4.5mtpa if a road overpass is constructed over the Kamillaroi highway.

In light of the expanded production during 2016 and 2017 and the proposed commencement of Vickery coal mine after the Maules Creek Coal Mine reaches full production in 2017/2018 construction of this road overpass should be required to be completed before approving any additional road haulage of coal.

Questions from the community:

- When was the Department of Planning and Environment first consulted to put in an application for retrospective approval to exceed current maximum approved road haulage for 2016, and to continue this during 2017?

If this 14% increase in haulage is evenly distributed across the calendar year Whitehaven would exceed the current approval conditions on November 15th.

- On what date do you expect to exceed your current approval conditions?

Tarrawonga and Rocglen believed to exceed current approval limits on 15th November 2016

Based on the figures provided, Whitehaven is due to exceed its 3.5Mtpa limit on November 15 this year and is relying on approval of this modification to prevent it being in breach of its approval conditions.

Questions from the community:

- At what point was the decision made to escalate the road haulage of coal from the Rocglen and Tarrawonga mines by 14% above current approval conditions?
- When was the decision made to have an additional 11,905 laden truck movements with their 23,810 right-turns of the Kamilaroi Highway?

Some facts about the proposed coal haulage intensification

Based on Whitehaven Coal's own commissioned traffic study (GTC Consultants) an additional 0.5mtpa of production over calendar year 2016 and also calendar year 2017 equates to:

- **11,905 additional one way truck movements**
- **23,810 additional right-turns across the Kamilaroi highway every year**

We do not consider it appropriate for this 14% increase in coal haulage and the increased risks to the public from these B-double trucks laden with 42 T of coal making these right-turns of the Kamilaroi Highway, and we believe if the public knew the statistics, this would be considered unacceptable by the community.

An addition of 11,905 truck movements in a calendar year is a significant increase and one requiring significant planning and coordination between the Tarrawonga and Rocglen mines.

Temporary increase in road haulage modification is opposed based on the following areas of concern

In **2.1 Tarrawonga Coal Mine**: The Tarrawonga Coal Project EA (2016) states that Tarrawonga coal **was** to be Processed at the Boggabri Coal Mine CHPP (to avoid road haulage to the Whitehaven Coal Gunnedah CHPP) in accordance with Condition 10, schedule 2.

However the EA (2016) states **that there is no current agreement** between Boggabri Coal and Tarrawonga Coal.

This is despite the previous claims in the Boggabri Coal modification EA application in July 2013 where it claimed there was a commercial agreement between Whitehaven, Tarrawonga (TCPL) and Boggabri Coal.

The Boggabri Coal Modification EA application in July 2013 stated:

“1.6.2 Whitehaven and Tarrawonga Coal

Whitehaven, TCPL and Boggabri Coal have entered into a commercial agreement to enable the handling, processing and transportation of coal from Tarrawonga Coal Mine at the Boggabri Infrastructure Facilities area (i.e. the subject of the Modification).”

In fact the Boggabri Coal rail spur has been in operation since December 2014.

Question from the community:

With such a commercial agreement in existence why is the current increased road haulage necessary?

And if no such agreement exists, was false and misleading information provided in the Boggabri Coal Modification EA July 2013?

Failed negotiations between Whitehaven Coal and Idemitsu Resources

In January 2013, Tarrawonga coal mine was given approval to transport up to 2 mtpa of coal by road to Whitehaven CHPP (Gunnedah) until completion of upgrades from Tarrawonga to Boggabri CM Infrastructure.

In July 2013 it was stated commercial agreements were in place for this to proceed.

However, the current state of negotiations with Boggabri Coal mine in regards to Tarrawonga using these rail facilities state no agreement has been made or is likely.

Question from the community:

Where are negotiations at in regards to the condition that Whitehaven, Tarrawonga and Boggabri Coal negotiate within 6 months of the Boggabri Infrastructure facility becoming operational and every 2 years thereafter?

In November 2014 road transport was increased to 3mtpa from Tarrawonga due to no commercial agreement.

Question from the community:

When did the Whitehaven, Tarrawonga and Boggabri Coal commercial agreement break down?

Roads and Maritime Service Submission

The Road Safety Audit identified a number of issues to be addressed along the Approved Road Haulage Route, including lack of justification on the basis of safety however has acquiesced to a post-approval study under the Austroads guidelines.

We believe the Austroads study should be done **prior to any approval** of this Modification, not subsequently. **What nonsense it is for the NSW Government to allow approval ahead of the safety issues being considered.**

The RMS submitted:

The palpable safety issues associated with this development have not been properly assessed, even by the RMS.

“5. The Transport Assessment and Road Safety Audit did not comment on the separation distance between intersections on the Kamilaroi Highway. **It is unclear if there is sufficient distance to enable acceleration, merging, diverging, deceleration and storage for heavy vehicles manoeuvring between the two intersections.** It is suggested that this length be reviewed in accordance with Austroads Guidelines, Australian Standards and RMS Supplements to determine its suitability for the proposed traffic movements.”

Whitehaven states it will address these issues “**where practicable**”. “Where practicable” has an economic component which does not allow for the construction of the much-needed overpass which will cost in the tens of millions of dollars.

Whitehaven Coal’s response to submissions

Only 4 submissions were lodged. This is unsurprising, given that the Modification allowed only 14 days exhibition. The Roads and Maritime Services of NSW although apparently critical of the risks attached to the Modification nevertheless approved it with a loose condition.

[https://majorprojects.affinitylive.com/public/2838d5a4f57b027b1b384f03061b4232/Tarrawonga%20Rocglen%20MOD3 %20Response%20to%20Submissions.pdf](https://majorprojects.affinitylive.com/public/2838d5a4f57b027b1b384f03061b4232/Tarrawonga%20Rocglen%20MOD3%20Response%20to%20Submissions.pdf)

Whitehaven have not addressed concern relating to deceleration (Blue Vale and Shannon Harbour), merely brushing off saying there have been no incidents to date and essentially waiting for accidents and possibly fatalities to occur.

Killing koalas

Regular users of the road network from Gunnedah to the Leard Forest mines will have noted the presence of dead koalas. The Namoi River in the vicinity of Rocglen, Vickery and Blue Vale Rd is a known koala haven. Yet the impacts on koalas or any other wildlife are ignored.

What this means to the communities of the Namoi Valley

- **WHC won’t build an overpass until there is an accident.**
- **The Department of Planning and Environment has said “OK” to that.**
- **Whitehaven will be in breach for exceeding its current approvals by 15th November.**
- **95,240 trucks laden with 42 tonnes coal equates to 1 every 2.5 minutes ***
- **190,480 right hand crossings of the Kamilaroi Highway by coal haulage trucks is 46 per hour, or around one every 75 seconds. ***

* Based on operational haulage hours for 4.0mtpa of coal by trucks with 42 T capacity 86.5hrs/wk, 48 weeks per year as used by GTA consults in Whitehaven Temporary Road Haulage Increase Modification submission.

- **There is a yet to be acknowledged cumulative impact associated with the concurrent Whitehaven owned Maules Creek Coal Mine Modification 3 which seeks to increase light traffic by 500%, much of which will pass through the critical stretch of the Kamilaroi**

Highway between Blue Vale Road and the Whitehaven CHPP. Further increasing the likelihood of fatalities.

(The assumption used by GTA Consultants is that there will only be a 2% increase in background traffic).

This is extraordinary, and has not been brought to the Public's attention!

Therefore, the Wando Conservation and Cultural Centre, whilst being primarily concerned with preservation of the natural environment of the Namoi Valley, offers its insights for the benefit of the affected communities so that they can demand the overpass.

**For further information contact:
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Approval Timeline

Tarrawonga

- 2010 – extract 2Mtpa until 2017
- 2013 (Jan) – extract 3Mtpa over 17 year and up to 2Mtpa by road to Whitehaven CHPP until approvals and upgrades from Tarrawonga to Boggabri CM Infrastructure.
- 2013(July) stated commercial agreement was in place for this to proceed
- 2014(Nov) approval to increase road transport from 2 to 3Mtpa due to commercial agreement not being in place
- (Additionally coal rejects from Whitehaven CHPP are trucked back to Tarrawonga or Rocglen).

Rocglen

- 2008 extract 1.5 Mtpa for 12 years
- 2011 (Sept) additional 4 years and continue 1.5 Mtpa
- 2014(Nov) road haul modified to reflect cumulative impacts from Tarrawonga and Vickery
- (Additionally coal rejects from Whitehaven CHPP are trucked back to Tarrawonga or Rocglen).

Vickery

- 2014(Sept) Annual production 4.5Mtpa over 30 years
- Will include overpass between Blue Vale Road and Whitehaven CHPP prior to any cumulative haulage exceeding 3.5Mtpa (From Vickery, Tarrawonga and Rocglen)
- This will increase to cumulative 4.5 Mtpa when overpass and private haul road constructed
- (Additionally coal rejects from Whitehaven CHPP are trucked back to Tarrawonga or Rocglen).

Further 90,000 m³ of gravel from site collected by customers using Approved Transport Route. 1m³ of gravel weigh 1.92 Tonnes – thus this adds 172 000 Tonnes transported and associated road volumes (based on average 13 Tonnes per load for 10 wheeler this constitutes 13 292 one way (26 584 return trips) **(Not clear whether this is per year or the lifetime of mine)**

If annual figure - This is an additional 50 one way trips or 100 return trips per day (based on 5 days per week -52 weeks per year.

Vickery Extension Project (EIS pending) anticipated lodgement late 2016

Not anticipated to start prior to end 2017.

Construction and operation of on-site CHPP to be used by Vickery, Tarrawonga and Rocglen Mines.

Whitehaven CHPP – consent expires 2022(Dec) handle up to 4.1 Mtpa product coal and 3Mtpa sized ROM coal processed at Whitehaven CHPP

Whitehaven Maules Creek Mine

July 2016(Modification 3) - A traffic proposal modification to increase light vehicle traffic to and from mine by over 500% above their current approval conditions.

In their modification application they freely admit they have been continuously breaching their original consent conditions for an extended period of time. (Based on their own commissioned traffic survey within the modification proposal)

This Road Haulage submission does not take into account the projected growth of Maules Creek Coal Mine over this period. Which is predicted to contribute most of a 15% increase in total road traffic from MCCM traveling south along the Kamilaroi highway by 2020 above 2015 approval conditions. This is an increase of over 400 daily southbound journeys along the Kamilaroi Highway.