

Department of Planning and Environment  
Attn: Executive Director-Resource Assessments & Business Systems  
Planning Services, Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2001

Tuesday 5<sup>th</sup> July 2016

**RE: SUBMISSION ON MAULES CREEK COAL Project Modification (Mod 3) TRANSPORT**

Dear Sir/ Madam,

I am writing in relation to the project modification application Maules Creek Coal Project has submitted relating to Transport.

I would like to make a submission by way of concern.

My concerns are as follows:

- the modification does not make clear and specify where the shuttle bus will operate from. I believe it should continue to operate to include Boggabri, Gunnedah and Narrabri as is currently stipulated as per Condition 63, Schedule 3 of the Project Approval (10\_0138)
- the modification at no times makes any reference to fatigue management of employees that choose or are unable to utilise the bus service
- the modification does not take into account any possible impacts in relation to increased individual car and traffic usage in the Boggabri township (which I believe would mostly be affected by any noise pollution and traffic safety issues)
- the submission makes reference to a residential based workforce where 'a high percentage of employees live in local towns and rural areas with their families, leading to bus use being less convenient relative to employees living in accommodation facilities'. I disagree with this statement and assumption. All employees have to get to work regardless of their living circumstances and a bus option from a WHS and fatigue management perspective is paramount to ensure not only employee safety but that of the general community. With employees working up to 12hr shifts and then having to travel back to Boggabri, Gunnedah and Narrabri (with some then commuting further afield via private car) a bus is essential to safety. This is especially highlighted by the fact that travel periods are usually during early hours of the morning or of an evening (as shown in the Road Transport Assessment results that Whitehaven had conducted by GTA consultants) when driving conditions are impeded.
- Reference made in relation to a 'residential workforce' does not take into account that employees may reside locally (Boggabri, Gunnedah, Narrabri and Tamworth (which is not so local)) but rent with other work colleagues and then travel to the family bases in towns in other regions (i.e. DIDO).

I strongly believe that Whitehaven should continue to provide a bus service free of charge to MCCM employees as a matter of duty of care incorporating fatigue management and also in consideration of the general community's road safety.

I think any modification should specify as in the previous Condition 63 that shuttle buses should be provided from Boggabri, Gunnedah and Narrabri.

I understand that specialised service personnel and contractors require specialised equipment and tools and would therefore not be covered under this modification application.

However Whitehaven determining 'that some 65 to 84% of MCCs direct operations, maintenance and CHPP wages employees typically use this service when working a regular shift' should indicate that employees are willing to utilise the service and whilst doing so minimises road safety and fatigue management issues.

I hope that you take these concerns into consideration when reviewing Maules Creek Coal's modification submission.

Yours Faithfully,

Jacqui McInerney  
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