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**Submission regarding:**

**Berrima Coal Project Application Number 10\_0172 and  
Boral Cement Works DA No. 401-11-2002-i MOD 6 – Coal Stockpiling**

I wish to convey my concern regarding both the proposed coal exports from the Berrima Coal project operating out of Medway Colliery and the associated coal stockpiling at the Berrima Cement works.

I have a number of objections and they are listed numerically as follows:

**1. Carbon Dioxide emissions.**

I am concerned about the increased carbon dioxide emissions that will occur from the additional coal exports that are not a part of cement production. We are told that Boral currently mine in the order of 110,000 tonnes of coal to meet current cement production. Lifting this to the applicants requested 460,000 tonnes will effectively quadruple the carbon emissions from Boral Cement plant associated with coal burning. On top of this we have the additional emissions due to calcining of the limestone. As a civil engineer involved in projects in Australia and internationally which consume very large amounts of cement I am acutely aware of the need to minimise where ever possible unnecessary emissions arising from cement production.

I am also very supportive of the ongoing profitable operation of the Berrima Cement plant. It helps no one if its operations are so cost constrained that Boral are unable to be innovative or are forced to compete with imports of low cost clinker from highly polluting Asian plants.

Nevertheless Boral have stated publicly that the income derived from coal exports is required in part to offset the costs of the Federal Government's proposed carbon tax. This is a corruption of the intention of that scheme and the need to reduce Australia's emissions. It is also in direct conflict with the principles set out in the Australian Cement Industry "Sustainability Report" to which that company is a founding participant.

Boral's application to expand production for export should be rejected. I seek the State Government's support for border adjustments to ensure imported cement and clinker are subject to the same carbon costs and environmental standards that Australian manufacturers are required to meet. These are in line with the recommendations of Professor Michael Grubb

of Cambridge University at ANU on April 13. We must ensure that critical industries do not come into conflict with the need to reduce carbon emissions.

## **2. Change of Use**

I express concern that the Berrima Cement Works Modification 6 Environmental assessment - Coal stockpiling for sale does not correctly address a substantial change in use of the Berrima Cement plant. This is effectively changing the cement plant into a coal works. This is especially significant for the Berrima Cement plant because of the proposed mining of coal at the Sutton Forest exploration lease owned by Hume Coal. With exports from that deposit being in the region of 1.5 million tpa, a very likely option would be to locate a coal loader at the Berrima Cement Plant with a second option being at the existing Medway mine. Other options would not be as cost effective for loading out the coal from Sutton Forest.

It is critical therefore that given the large scale of community opposition to the Hume Coal operations, a very careful Environmental Assessment be prepared by Boral for any coal works at the cement plant.

The current EA is neither careful nor thorough. For example a substantial confusion over scale of operations in Boral's two documents namely:

1. Berrima Colliery Continued Operation Environmental Assessment (DOC 1) and,
2. Berrima Cement Works Modification 6 Environmental assessment - Coal stockpiling for sale (DOC 2)

There is a significant contradiction in the two EA's prepared by Boral as to the scale of exports from Port Kembla.

### **1. In DOC 1, Paragraph 5.6 – Transportation the report states:**

*Notwithstanding the above, the amount of coal despatched to Port Kembla for export would not exceed 340,000 tpa but in reality is likely to be much less than this figure.*

### **2. In DOC 2 the ARUP Executive summary states:**

*Surplus coal which will be produced at the Berrima Colliery in future years is proposed to be exported via Port Kembla in shipments of 20,000 to 25,000 tonnes each, subject to a maximum export capacity of 100,000 tonnes per annum ( 5 export shipments per year ).*

### **3. In para 3.1 of DOC 2 – Proposed Activities**

*Production rates at Berrima Colliery have varied over time between 125,000 and 460,000 tonnes per annum of run of mine coal with capacity to produce up to 500,000 tonnes per annum. The current production rate is approximately 220,000 tonnes per annum. Therefore, there is an excess capacity of up to 230,000 tonnes per annum which is available for sale. Boral proposes to sell up to 100,000 tonnes of this coal annually.*

What actual export tonnage are Boral asking for and from where will it be shipped? Do they wish to ship 340,000 tpa or 100,000 tpa through the Berrima plant? With 20,000 tonne

shipments this means the stockpile is turned over either 17 times per year or five times per year. What does Boral actually propose to do?

### **3. Unsafe Road Conditions**

Boral propose to continue and increase coal haulage along Medway Road to both the cement plant and to external customers. As civil engineer with considerable design and construction of similar roads I advise The current road does not meet Austroads design standards is currently unsafe and presents a clear current danger to the residents of Medway and surrounding properties.

In summary:

- a) The road is structurally inadequate for heavy haulage and contains many pavement failures along its loaded side.
- b) These failures will cause heavy trucks to move towards the crown of the road increasing the likelihood of head on accidents particularly on bends
- c) The road has inadequate drainage.
- d) The road lacks shoulders which weakens the pavement. Of significant concern is the safety to numerous bicycle riders who use the road and will likely be killed through impact with coal trucks.
- e) The road is too narrow to safely line mark in that the final lane widths would be less than 3.5 metres. No line marking exists.
- f) No local widening or safe refuges exist for school buses or the entry and exit of landholders on adjacent properties.

#### 4. Excessive Dust

Upon release of the EA for public exhibition the Medway residents became aware of major obfuscation in this report – generally known as a “snow job”. We have residents who are subjected to continual dust deposition on their roofs, cars and washing as shown in the following figures. Who daily experienced wheezing and deposited dust throughout their homes. The cause is clearly evident as seen in the dust being generated by the Boral coal haulage truck shown in the accompanying photo.



The report prepared by ENVIRON Australia makes many predictions and references many possible control measures but in the end it does not address the actual ongoing failings of Boral to mine coal and haul it without harming the local community.

#### 5. Noise

Boral failed to consult with the local community during the preparation of either of the currently displayed proposals. If Boral had properly consulted then the following very key noise issues would have been addressed in the EA and listed for the Directors attention.

The residents are exposed to a variety of noise sources from the existing operations:

- a) Road noise from loaded coal trucks and hard booming noise from return empty metal bodied trucks
- b) Operation of reversing beepers from front end loaders operating at Loach Catherine when trucks are being loaded.
- c) Very intrusive noise generated by coal being dumped into the empty metal bodies of trucks
- d) The banging of tail gates and delivery hoppers.

These noises are generated at unacceptable times of day and on weekends and public holidays. This included recent haulage on Anzac day. It appears that local coal haulers operate at random times to suit their own convenience.

The type of noise generated needs to be properly identified. Intense and sharp metallic sounds are generated throughout the day and most intrusively in the evenings at 7 and 8pm. This is not a high output colliery. With current outputs of less than 200,000 tonnes per annum there is no sensible reason why extended hours of operation are carried out.

**I request that no noise generating activities either at the colliery or through haulage of coal be carried out outside of the hours of 7.00am to 6.00pm M to F and 7.00 am to 1.00pm on Saturdays. No noise generation to take place on Sundays or public holidays.**

## **6. Deferment of Consideration of Berrima Colliery Continued Operations Environmental Assessment**

Boral can't export coal to Port Kembla until an approved method of haulage exists. Following the failure of a concentrated campaign in January 2011, Boral have proposed a high turnover buffer stockpile of some 20,000 tonnes be located at the Berrima Cement plant. From paragraph 5.6 – Transportation on page 19 of the EA, up to 340,000 tonnes per annum could go through this stockpile representing a turnover of 17 times per year with accompanying dust emissions to New Berrima

Therefore, until the issues surrounding:

- buffer storage,
- road safety and capacity,
- noise,
- working hours and
- dust generation

are resolved it is requested that the current consideration of Berrima Colliery Continued Operations Environmental Assessment and the coal stockpiling be deferred.

Yours faithfully

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