

DUBBO ZIRCONIA PROJECT

SUBMISSION BY CAROLYN PASCOE

IN RESPONSE TO PUBLIC EXHIBITION OF ENVIRONMENTAL IMPACT STATEMENT

THE APPLICANT'S DIMINISHED SUPPORT FOR IMPLEMENTATION OF RAIL TRANSPORT OF INPUTS AND OUTPUTS

- I have attended a number of community meetings convened by the Applicant at the Toongi Hall over the past 15 years. At these meetings, the Applicant continually assured the community that it intended to seek the upgrade and reopening of the disused Dubbo to Toongi sector of the Dubbo to Molong railway. The Applicant consistently stated that it was their overwhelming desire to ensure that the majority of the inputs and outputs for the site were transported by rail, thus reducing the number of heavy vehicle movements on the Obley Road.
- At one of the Toongi community meetings, residents were advised that the Applicant was keen to see the rail line used as a tourist facility to transport visitors to the Zoo and Dundullimal. We were also advised that employees could catch the train to and from work, thus reducing the number of light vehicles on the road. I now see no mention of either of these proposals in the EIS documentation.
- At 4.15.5.2 of the EIS documentation the Applicant states that: *"The incorporation of the Toongi-Dubbo Rail Line would have social benefits associated with a reduction in the volume of heavy vehicles using the State Highway and local road network"*.
- One of the Objectives of the DZP as stated at 1.3.2 of the Traffic Impact Assessment is to *"establish, re-establish and/or upgrade local/regional infrastructure for the purposes of the Proposal but which could also have beneficial uses for other industry/activities."* The reopening of the rail line and the placement of a gas line to the plant would go a long way to meeting this objective, although the apparent lack of commitment to sharing the benefit of these is discussed below. This point could also be made regarding the construction of the water pipeline and the new electricity line which appear not to benefit anyone else except the Applicant.
- Only recently has it emerged that the rail option has fallen out of favour with the Applicant. The Applicant now *"considers it would be at least five years from the commencement of the Proposal (approximately 2020) before the incorporation of the rail option would be feasible"* (2.12.1).
- The Applicant submits that it would *"within five years of receiving development consent, complete a thorough and comprehensive review of the transport task to assess the feasibility of the rail option. This report would be provided to DP&I and other relevant stakeholders and a final decision made as to the*

incorporation of the rail option into the transport task provided at this time".
(2.12.1)

- At 2.1.2.3 it is stated that: *"The timing for the reopening of the Toongi-Dubbo Rail Line in relation to the commencement of operations remains to be confirmed. While it would be the preference of the Applicant to incorporate rail transportation from the commencement of operations, consideration of various logistical, operational and economic factors indicates that it would be at least five years (approximately 2020) before this would be feasible".*
- These views are continually repeated throughout the EIS documentation although there is very limited detail provided of what these various *"logistical, operational and economic factors"* are which make the option initially unfeasible.
- The dot points contained in this Overview section could not be more negatively pronounced in regard to the implementation of rail to the Site: e.g. *"has not been confirmed", "no certainty", "may be (significant) delay", "risk of under-utilisation of the trains on the paths", "some community reticence"*.
- I cannot understand that if a rail component is still the Applicant's preferred method of transporting reagents to the site and outputs from it, that this section would not detail its benefits rather than listing reasons why it will all be too hard and expensive to implement.
- I firmly believe that the vast majority of local residents and the wider community would support the maximum utilisation of the rail option so that the residents, tourist attractions and businesses along the proposed road routes have the bear the minimum number of heavy trucks as is possible.
- Additionally, I cannot comprehend why the Applicant has not already completed this feasibility work given that they have been working on this project for nearly 20 years.
- I believe there is an extremely high likelihood that if this project is allowed to commence and run on for five years, during which time the Applicant undertakes to prepare some additional paperwork, that the rail line will **never** be reopened. Costs will continue to increase and the Applicant will just have more time to concoct more reasons why it cannot implement the option.
- The EIS contains little detail but a few clues as to why the Applicant has moved its support away from rail, however, in Section 6 – Proposal Evaluation and Conclusions, 6.1.7, the Applicant's somewhat convoluted views are expressed: *"It remains the preference of the Applicant to develop the rail to Toongi option (Option A) and the 2013 DFS Study for the Proposal incorporates the capital and operational costs of the Toongi-Dubbo Rail Line upgrade and operation. It is noted that incorporating the rail line to Toongi would increase total capital cost and increase the complexity of the transport task of the DZP. **"The simplest and cheapest option would be to operate a road transport fleet only."** (emphasis added). However, the environmental and social benefits of reducing the number of heavy vehicles on the roads of Dubbo and NSW have been considered and influence the Applicant's*

preference for including the Toongi-Dubbo Rail Line upgrade into the Proposal."

- The above paragraph is totally confusing. The first sentence seems to be saying that it is their preference to pursue the rail option, the middle section indicates that it is all too expensive and difficult to pursue the rail option, and the last section seems to state that it is the Applicant's preference to **include** the option in the proposal, not that it is their preference to **implement** it.
- During my review of the EIS documentation and a search of the internet, I was only able to locate a media release about the 2013 DFS Study, which did not elaborate on what the actual costs associated with the rail option were.
- At 1.7, 1-21 it is stated that Mrs Diana Gibbs has *"also undertaken an economic assessment of the various transport options of the Proposal."* I have not been able to find this documentation on the Department's or Alkane's websites, but it would be very helpful to have had this detail available.
- The rail pathway is already in place. Most proposed mines have no rail infrastructure in place making it a much more expensive and logistically difficult option involving substantial land acquisition and lengthy approval processes.
- None of this is necessary for the DZP project. Of course, substantial improvements are required to the rail line and some of the bridges, but if this mine has the lifespan we are led to believe, (potentially more than 100 years), the economies of scale become much more favourable. It seems to me that rail is a much more sustainable long term option for the community.
- The Applicant also proposes to take advantage of the existing rail easement to place a gas line to the site. Again, this compares very favourably with other new mines or manufacturing facilities which have to negotiate with and compensate multiple landowners to put down a gas line.
- The Applicant therefore gains a significant benefit from the community in placing this pipe on public land. It would appear that the Applicant is only required to negotiate with one authority for approval to place the gas line. The Applicant makes no mention of how the proposed pipeline might potentially be utilised by other consumers and thus widen this benefit to the community.
- I submit that this EIS should only be approved with a condition that the Applicant utilises rail to its optimum extent in order to minimise the number of heavy vehicles on the region's roads. The Government should not approve the EIS in its current form because it does not contain a detailed assessment of the rail option.
- Further, the Applicant should not be allowed to commence operations at its processing plant until such time as the rail infrastructure improvements have been completed and commissioned to commence the transport of the inputs to the site and the output of export product.

- I assume that 2.12.3.1 should refer to Option A in the last line and not Option C.

Location of Processing Plant etc

- At 6.1.6 the Applicant states that: *“On the basis of the Dubbo-Molong Rail Line being upgraded to Toongi to allow for the transport of bulk reagents by rail to the DZP Site, the location of the processing plant would be required adjacent to or in close proximity to the rail line”.*
- At 1.1 of the Traffic Impact Assessment, it is stated that: *“The processing plant, which would be **the hub for most traffic movements to and from the DZP**, would be located adjacent to the disused Dubbo-Molong Rail Line”.* (emphasis added).
- Right from the beginning of the community consultation, the Applicant stated that the positioning of the processing plant and nearby facilities so close to Toongi Village and the Toongi Hall were necessary because they had to be near a 1km section of flat rail line.
- If the Applicant decides not to pursue the reopening of the rail line and the Department does not insist that the rail line be redeveloped prior to the project’s commencement, the Applicant should be required to completely reassess the location of these ugly, noisy and smelly facilities. They should be moved completely away from the vicinity of Toongi village, the Toongi Hall and out of the view of surrounding residents. Why should the Applicant be allowed to spoil the peace and outlook of the residents and users in this area if there is no intention to use the rail line?
- The Applicant already owns a considerable amount of land surrounding the mine site which leaves it with plenty of options to consider. Other locations within these landholdings should be assessed as there may be other benefits such as being closer to the water source.
- At 1.3.2 of the Traffic Impact Assessment, the principal objectives of the DZP are stated. One of these is to *“minimise the disturbance footprint associated with the proposed activities”*. If the processing plant and associated activities were moved away from the proposed location, it would go a long way to decreasing the disturbance footprint. This “hub for most traffic movements” should be relocated to an area where there will be fewer disturbances to residents.

TRUCK MOVEMENTS ON OBLEY ROAD

- At 2.6.1 of the Traffic Impact Assessment which discusses Construction Traffic, there is no reference to whether the heavy equipment to be delivered to the Site will be delivered at night. It only refers to it occurring 6 days per week. This equipment should not be delivered at night due to the heightened risk to road users and increased noise for residents.

- The estimated 7560 heavy vehicle movements over the 420 day construction period is a huge amount of movements. The Applicant must be required to have completed all road upgrades prior to these movements commencing.
- The Applicant proposes to operate the processing plant on a 24/7 basis. I have not been able to ascertain if this means that heavy vehicles will also operate to and from the site at night. Obviously if there is a high level of heavy vehicle movements after dark, the risk to other road users is increased. If trucks are to be operated at night it would also be a concern if they made loud noises when backing and dumping their loads. Trucks turning and braking at night at the Obley Road/Toongi Road intersection would also be a concern for nearby residents.
- Even if the rail option proceeds, there will still be a significant increase in the number of heavy truck movements on the Obley Road, thus raising the risk for other users. I am not sure how the Applicant can contend otherwise as it does in its documentation.

EMPLOYEE AND CONTRACTOR MOVEMENTS

- In 4.12.3.1 the Applicant discusses traffic during the expected 18 month to two year construction period and considers that there will be 300-400 light vehicle movements per day.
- In 4.12.3.2 the Applicant discusses traffic once the Site is operational. It assumes that the majority of employees would commute to and from the Site in their own vehicles.
- At one of the Toongi community meetings I specifically recall asking about transport arrangements for employees and whether buses and carpooling were proposed in order to reduce the vehicle movements on the Obley Road. I was advised that these definitely were proposed and supported and that the employees might even travel to/from work on the train with the plant inputs/outputs!
- The Applicant should be required to implement strategies to reduce the number of employee/contractor light vehicle movements preferably by running buses to and from the Site. This should apply both during the Construction and Operational periods. This would assist the Applicant to address the risk discussed at page 6-19 where it states: ... *“as the Applicant does not control motorists who use those roads, the potential for accidents cannot be eliminated.”*

OTHER ROAD ISSUES

Road Maintenance

- 4.3 of the Traffic Impact Assessment states that there will be an ongoing requirement of Council as the Road Authority to maintain the roads utilised for the Proposal. It states that *'road maintenance contributions be made commensurate with the traffic generated by the Proposal'*.
- It continues: .. *"the negotiations should take into consideration the extensive road and bridge upgrades recommended and the associated impact of the traffic generated by the development on the roads .."*. I do not follow the reasoning of this statement. These upgrades would not have been necessary or undertaken but for the Applicant's proposed activities.
- The Applicant must be required to contribute a fair and reasonable amount towards the continual upkeep of the roads and bridges which will be used by project traffic.
- There are very regular media items dealing with the lack of commitment by mining companies in regional areas to 'do the right thing' in this respect. Local roads have been degraded with the various stakeholders engaged in protracted disputes about who is responsible for the maintenance. The losers unfortunately tend to be the local residents and ratepayers.

Speed zone on Obley Road

- At 4.12.4 the Applicant states that it will consult Council and RMS in relation to moving the 60km/hr speed zone on Obley Road to the south of Dundullimal Homestead access road. There is no indication of why this is proposed and in fact it is an 80km/h speed zone at present.
- The Applicant should be requested to provide further information and justification for this proposal.

Toongi Road Upgrade

- At 4.2.3 of the Traffic Impact Assessment, it is recommended that Toongi Road *"be significantly upgraded to a standard appropriate for the forecast volumes of heavy vehicles. The road standard shall include an 8.5m seal on a 10m formation and the design"*
- This appears to be completely contradicted by 2.2.5.3 where it states that Toongi Road *"would be widened between Obley Road and the DZP Site Entrance to provide for two sealed lands at least 3m wide"*. There seems to be quite a difference in what the Specialist considers is required and what the Applicant is prepared to undertake.
- 4.2.3 does not indicate which parts of Toongi Road are to be widened, however I assume that the Applicant is only proposing to upgrade Toongi Road as far as the Site entrance and not its whole extent. This needs to be clarified.

Cyclists using Obley Road

- I am a supporter of cyclists using our roads and I am happy to see them enjoying this healthy activity. I do however think there is a complete over-emphasis and focus in the Applicant's assessment of the impact that the increase in heavy and light traffic on the Obley Road might have on cyclists compared to the impacts on its residents.
- I refer to: 4.12.5.8 where cyclists are listed first before all other stakeholders which use the road (residents are only third in the list).
- In 2.2 of the Traffic Impact Assessment, Road Condition Report, the emphasis continues on cyclists. For the Obley Road, a very significant part of the information contained in this section relates to the various cycle user groups and their cycling routines. I am not really sure how this detailed information relates to the 'road condition' of Obley Road. Perhaps the author is a keen cyclist. Cyclist usage of Toongi Road, Bootherba Road and Yarrandale Road is also discussed in this section (and again at 4.2.3).
- In Table 5.1 - Draft Statement of Commitments, section 14 – Traffic and Transportation, Desired Outcome: Achieve safe and efficient transport operations, there are 8 Action items. Two of these 8 items relate to consulting with cycling groups! This indicates to me that the Applicant considers the safety of cyclists to be paramount, and above those of residents.
- As a leisure activity where there are obviously high risks associated with sharing a road with B Double trucks and hundreds of employee vehicles, cyclists can choose to cycle on another roadway with less hazards.
- The residents of Obley Road cannot however choose another road for their children to travel to and from school, or on which to drive to town for employment, shopping or farm supplies.
- The EIS documentation contains very little mention or concern about the impact of the increase in traffic on individual residents, especially those whose houses are close to the road. This indicates to me that the cycling lobby is strong and the residents' voice is not, or that the Applicant does not consider it to be important.
- The use of roads by cyclists is a peripheral and diversionary issue and should be treated accordingly.
- Similarly, at 4.2.7.8 the Applicant seems to be genuinely concerned about the breeding cycles of the Western Plains Zoo's animal residents and offers to schedule *"road upgrades on the Obley Road in the vicinity of the zoo outside the proposed breeding period for the relevant species"*. It begs the question of whether the Applicant holds any such concerns for the human residents of the Obley Road and whether it will agree to modify its road upgrade schedule accordingly!

AMENITY VALUES

- At 4.15.5.5 the Applicant considers the probable change in amenity values for Toongi. There is no mention of the Toongi Hall and Recreation Reserve. As stated in my covering letter, every year the Hall and Reserve play host to a multitude of meetings, weddings, car rallies, parties, overnight campers/caravaners and reunions. It is a peaceful spot with beautiful shady trees. Visitors often remark that it is just a lovely spot.
- The Applicant proposes to place a mineral processing plant and waste treatment works within a few hundred metres of this delightful place and the Toongi Village.
- The footprint of this Site is certainly large enough to place this facility away from these long established facilities.
- The proposal as portrayed in the EIS will result in a significant change to this peaceful and beautiful locality and the loss of this “rural ideal” at Toongi.
- This contention is supported by section 6 of the Socio-economic Impact Assessment which states that: *“It is acknowledged that converting a relatively quiet rural setting into an industrial scale mineral processing facility is a significant change.”*
- The Applicant should consider options to ensure that the amenity value of the Toongi Hall and Reserve and Toongi Village are not diminished.

BUSHFIRE RISK

- Within 4.14.3 there is no indication that the Applicant considers it has a wider community responsibility to assist in bushfire fighting or supporting the surrounding Rural Fire Service brigades.
- This project involves a dramatic increase in road traffic to and from the Site and hopefully the use of rail.
- There is no mention of whether the Applicant has considered that these factors significantly increase the risk of a truck or motor vehicle accident/rollover, chemical spill, or train incident resulting in a fire away from the Site but within the wider community.
- The Applicant would no doubt rely on the attendance of the relevant fire fighting personnel at the location, and perhaps VRA or SES. The Applicant should clarify what action if any it would take to address this issue.
- At 4.14.3.5, the Applicant undertakes to implement a number of management and mitigation measures to minimise risks associated with starting of bush fires **within** the DZP Site.

- One of these measures is to ensure that *“a water cart is available to assist in extinguishing any fire ignited”*. I am not sure that one water cart would be sufficient to fight more than a small fire given the probable high number of ignition sources within the Site. I have no doubt that the Applicant would also rely on the assistance of external resources to fight anything but a very minor fire within its boundaries.
- Given the unique and completely new nature of the work which will be undertaken within the Site, the Applicant will need to be extremely aware of its responsibilities with regard to fire. The Applicant should be required to elaborate on these issues.

WATER REQUIREMENTS

- The Applicant proposes to build and operate an on-site potable water processing plant. Given that all other residents in the Toongi area are responsible for providing their own domestic water via harvesting of rainwater from roofs of houses and sheds, does the proponent intend to harvest water on site for use of its employees? Given the large roof area of the intended structures, it seems a waste not to utilise this resource.
- This raises the issue of whether the Applicant has considered the possibility of dust residue (possibly radioactive) in such water if it were harvested and used on site for its employees. If this is the case, has the Applicant considered to what extent such contamination might travel and what action it intends to take to provide suitable potable water for the community's residents. What about the water collected from the roof of the Toongi Hall (according to 4.1.4.2 is located 280m west of the DZP Site), which is used by hundreds of visitors and overnight campers/caravaners each year for washing, tea/coffee making and drinking water.