

31 October 2019

Melissa Anderson  
Planning Officer  
Resource Assessments  
NSW Department of Planning, Industry & Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Ms Anderson

**Bulga Optimisation Project (Mod 3)**

I refer to the Statement of Environmental Effects (SEE) for the above project exhibited on the NSW Planning Portal.

The Bulga Coal Complex consists of both open cut operations and underground operations, using shared coal washing and rail loading infrastructure. The complex is located approximately 4km south-east of the town of Bulga, 4km north of Broke, and 12km south-west of Singleton. The proposed modification includes an extension of open cut operations to the south east into a former open cut area to access deeper resources. This area is currently being occupied by tailings storage facilities. The modification requires changes to infrastructure serving both the open cut and underground operations. The proposed modification will extend the disturbance area by 20.2 hectares, and the life of the already approved operations by 4 years, until 2039. The currently approved extraction rate will remain unchanged.

The comments provided in this letter are contingent on confirmation by the NSW Environment Protection Authority (EPA) that the methods employed to assess air quality and noise impacts are appropriate. If this was found not to be the case, our comments would need to be considered in light of the methodological issues identified by the EPA.

Hunter New England Local Health District (HNELHD) has reviewed the SEE concentrating on assessments of air quality, noise, water and other issues that may impact on public health, and would like to provide the following comments:

**Air Quality**

HNELHD notes that a property is predicted to experience exceedances of the annual average PM10 criteria of 25  $\mu\text{g}/\text{m}^3$ , with a prediction of 27  $\mu\text{g}/\text{m}^3$  in both 2022 and 2026.

There is no evidence of a threshold below which PM is not associated with health effects and so HNELHD strongly supports the implementation of proactive and reactive dust control strategies as mentioned in the SEE, along with all best-practice interventions to minimise PM emissions.

**Hunter New England Local Health District**  
ABN 63 598 010 203

**Hunter New England Population Health**  
Locked Bag 10  
Wallsend NSW 2287  
Phone (02) 4924 6477 Fax (02) 4924 6490  
Email HNELHD-PHEnquiries@hnehealth.nsw.gov.au  
www.hnehealth.nsw.gov.au/hneph

**Noise**

Environmental noise can have negative impacts on human health and well-being, and trigger ongoing community complaints about annoyance, sleep disturbance and stress. Evidence concerning the adverse health effects of environmental noise, which include cardiovascular disease, cognitive impairment and tinnitus, are detailed in a number of publications, including the following publications from enHealth and the World Health Organisation (WHO):

- *The health effects of environmental noise, enHealth (2018)*
- *Environmental Noise Guidelines for the European Region, WHO (2018).*

The Noise Impact Assessment in the SEE predicts that noise levels will meet the currently approved noise criteria at all surrounding private residences.

HNELHD supports the management of noise impacts via the implementation of the ongoing real-time monitoring program combined with proactive and reactive noise management measures as discussed in the SEE. It is important that this includes a complaints mechanism for residents which enables both rapid assessment and corrective measures (if required) to be implemented.

If you require any further information please telephone Carolyn Herlihy, Environmental Health Officer on 4924 6477.

Yours Sincerely

A handwritten signature in purple ink, appearing to read 'David Durrheim', is written over a large, light purple circular stamp or watermark.

Professor David Durrheim  
**Director Health Protection**  
**Hunter New England Population Health**