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Stratford Coal Extension Project.

This submission is made by an affected family on a farming property which neighbours the Stratford Coal Project (Yancoal).

Due to the limited amount of time to respond to the extension application, these comments and recommendations are not based on the whole EIS but just the immediate areas that affect us as a family or as identified in the EIS as "residential receivers".

The issues that affect us are:

- Noise
- Proposed 24 hour mining operations
- Blasting
- Dust
- Greenhouse Gas Emissions

Noise:

The EIS uses advice from consultants and company records to form a model which shows how the residential receivers (family homes) are to be affected. This modelling seems to be biased and favourable to Stratford Coal. However we can already hear the current mining operations so we are rather puzzled by the consultant's findings. Without the fancy modelling I can assure you that at my house we do hear the mining noise almost on a daily basis from about 7am until into the evening.

The noise is mostly haul truck noise with some dozer/excavator type noise. The noise is variable and often sounds like a truck or 4wd vehicle is racing up the driveway. It is amazing how often we jump up to see who is coming up to our house. It is very frustrating, annoying and time consuming. This mining noise can also be heard quite a distance from us by residents in Phillips Road and along Waukivory Road as far as the Glen Road turnoff. I have had reports from residents further south on Waukivory Road at Warranulla but I suspect the noise they hear is probably generated from Yancoal's pit at Duralie.

In the EIS the following disclaimer from the consultants states:

"This report has been prepared by SLR Consulting Australia Pty Ltd with all reasonable skill, care and diligence,

and taking account of the manpower and resources devoted to it by agreement with the Client. Information reported herein is based on the interpretation of data collected, which has been accepted in good faith as being accurate and valid".

It appears that the modelling does miss crucial data.

Noise Recommendations:

The mine asks for approval based on its EIS and consultants' modelling then its mining lease should be limited to the scope of the report and the proposed modelling. Should those standards be exceeded then the mine should shut down.

The project identifies about 110 privately owned landholders (residential receivers), and they should be given the equipment to do basic sound testing to monitor and police the activities.

Those 110 landholders should have been supplied with the EIS on Compact Disc so they could examine the EIS in some detail in the comfort of their homes and present a timely response.

Proposed 24 hour mining operations:

- The Stratford Coal CCC unanimously voted against 24 hour operation;
- The Gloucester Council voted against 24 hour operations;
- At several public meetings 24 hour operations were unanimously voted against.

Stratford Coal has no social licence to mine 24 hours and yet it has applied for just that.

We are told in the EIS that 24 hour operation is pivotal to the mine's success, but gives no detail to explain the argument.

We are told on a regular basis that these projects are state significant and we should just accept being pushed around by the mining companies. Sydney Airport, which is of much greater state significance, has a night time curfew for the wellbeing of residents. If it is good enough for Sydney residents then Stratford Coal or any other mining company should respect people's right to a restful sleep at night.

Another aspect is the Low Frequency Noise which is being investigated as probably one of the most health disturbing factors from large machinery and train loading.

Recommendations to Proposed 24 hour mining operations:

The proposal for 24 hour mining operations (including waste rock removal), should be rejected outright.

I believe that no night time work should be carried out and that this policy should be extended to the coal washery and train loading facility.

Blasting:

Again the issue is that the EIS states that I'm not affected.

However I hear the blasting regularly and on the 1st June 2012, we had the house shake.

We are approximately 4km from mining activities and were informed by Stratford coal that didn't happen. The results for that date were just like all other blasts. This raises even more questions as to what is being measured and whether it is relevant as meaningful data. There are numerous complaints from surrounding residents about noise, windows rattling and damage done to the walls and ceilings. One resident has been recording blast noise and when reporting the noise exceeding limits they are told they are measuring the wrong thing and that all blasts are below the EPA levels. If you make the mistake of raising your voice during a complaint, Stratford Coal employees send the police to speak to you about threatening behaviour. A very poor method of managing complaints.

Physical complaints are also met with deaf ears. On one occasion Wenham Road totally subsided which prevented milk truck collections to a local dairy for a week. Several properties, including mine, adjacent to blasting have experienced land slips which I believe were triggered by continual blasting. The mine personnel state categorically that it is not caused by blasting and may have been due to heavy rain, possible soil types, may be over cleared land, but definitely not blasting. I admit that is probably due to a combination of factors but nothing has happened in the last 40 years except that now we have a common neighbour who blasts several times a week and progressively getting deeper into harder rock. When the mine opened in the 1995, the main pit went down to around 70 – 80 metres deep, now they are digging down to 200 and more metres. At this depth the rock is denser and the vibration carries further up slope to the eastern boundary of the valley which is where the landslip properties are located. It is not rocket science to realise that blasting is the major factor in these land slips.

Recommendations to the Blasting Issue:

Reduce Blasting effects of vibration/air blast noise criteria by modifying the blast technique. We are told at Community Consultative Committee meetings that the blast technique can be redesigned to reduce vibration and noise to the surrounding areas and houses.

Treat landholders with respect.

Dust Issue:

This issue is a very pressing issue which has huge implications for health. The EIS clearly states that I am not affected by larger particle (PM10) dust, but should expect a small amount of fine particle (PM2.5) dust which is less than the assessment criteria of 25ug/m3.

I consider that having to breathe in any amount of carcinogenic dust is untenable.

The EIS states quite clearly that coal dust is not a factor for me. However we had our house tanks cleaned. The contractor has an ongoing contract cleaning coal-affected water tanks in the Camberwell district. He remarked that we had coal dust in our rainwater tanks.

People living north of the mine in Jacks road have complained about coal dust in there swimming pool filters. Some Gloucester town dwellers have also noticed that the dust is getting worse.

A couple of locals have commented on the morning mist that settles around the town which used to be pearly white is now a discoloured brown colour – no doubt pollution from the mine containing small and large particle dust.

It seems to me that a lot of people, old and young, whose health is being jeopardised by the greed of the mining companies. It is a fact to reflect on that Gloucester prior to being bought out by Yancoal grew over a 10 year period from a small and almost bankrupt company to a company in size of 1.4 billion dollars which is an amazing growth of around 140 million dollars and took its place in the top 100 companies on the ASX. Now they are telling us for them to stay viable they need to mine closer to residents and for 24 hours a day.

It is not just a human concern, we have noticed calves born on the edge of the mine area are coughing. Even the cows occasionally cough. This is just an observation but could be an indicator of worse things to come. I am a healthy person, and now I suffer every year with various respiratory problems which are hard to clear up. I have many more visits to my GP and often need prescribed medication which I have never needed before.

I am personally disgusted that innocent people are expected to suffer for the greed of mining companies who are increasingly owned by offshore interests.

Recommendations to Dust:

Reduce dust

Organise an independent in-depth health study on the people of Gloucester and surrounds. Health testing should be done on all issues concerning health by noise, dust, light, sleep disorders and stress caused by uncertainty created by the mine.

Cease mining until a proper assessment of dust in the area is completed.

Greenhouse Gas Emissions:

The report is very light on detail on Greenhouse Gas Emissions and puts almost no effort into the release of fugitive CH₄ during mining – (scope 1 Direct Greenhouse Emissions).

A quote from the EIS states:

"For the Project, SPCL would also directly measure the gas content representative of the coal seams being mined in order to provide a site-specific factor of the scope 1 emissions".

I would suggest that Gloucester Coal already has this gas content information.

In the late 1990's McElroy Bryan Assoc, the geological consultants to Gloucester Coal conducted methane gas testing on methane content in the seams in the project area and produced a comprehensive report. John Bryan, chief of the McElroy Bryan consultancy was on the GCL board of Directors, and Gavin May, geologist responsible for the methane gas testing became CEO of GCL.

This indicates a lack of integrity in some of the information presented in the EIS.

Recommendations to Greenhouse Gas Emissions:

No recommendations just reporting an observation.

Conclusion:

I contend that the EIS is seriously flawed.

The mine asks for approval based on its EIS and consultants' modelling then its mining lease should be limited to the scope of the report and the proposed modelling. Should a mining lease be granted based on this EIS, then Stratford Coal should live by its findings.

In the event of any of the EIS criteria being exceeded then their rights to continue mining should cease immediately.

Anthony and Diana Berecny

For any clarifications of this submission, I can be contacted by: mail at PO Box 210 Gloucester 2422, or by email: <vocaledge@bigpond.com>