

POSTAL: PO Box 168 Gloucester NSW 2422
PHONE: +61 2 6538 4200
WEBSITE: www.stratfordcoal.com.au
ABN 26 064 016 164

28 October 2013

Minister for Planning and Infrastructure
c/- Director, Major Project Assessment
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Attention: Paul Freeman

Dear Paul

RE: SUBMISSION ON THE PROPOSED ROCKY HILL COAL PROJECT - ENVIRONMENTAL IMPACT STATEMENT (SSD-5156)

Stratford Coal Pty Ltd (SCPL), a wholly owned subsidiary of Yancoal Australia Limited (Yancoal), owns and operates the Stratford Coal Mine (SCM) and the Bowens Road North Open Cut, which are located approximately 5 kilometres (km) south of proposed Rocky Hill Coal Project (RHCP), and are collectively referred to as the Stratford Mining Complex.

Yancoal also owns the Duralie Coal Mine (DCM), which is located approximately 20 km south of the Stratford Mining Complex. Run-of-mine (ROM) coal from the DCM is transported by rail to the Stratford Mining Complex, where it is processed along with ROM coal from the Stratford Mining Complex. The North Coast Railway services the Duralie shuttle train, Stratford product coal trains, passenger and general freight trains.

As the Duralie shuttle train is given the lowest priority, it is often subject to rescheduling to account for delays to other fixed path services with higher priority (e.g. the passenger and freight trains). Such conflicts can occur with coal export trains, the timing of which is determined by the timing of export shipments and the Hunter Valley Coal Chain Co-ordinator (HVCCC).

Section 4.9.7 of the RHCP Environmental Impact Statement (EIS) states:

Trains associated with the Proposal would operate to mandatory timetabled paths as dictated by ARTC and there are sufficient train path availabilities to adequately cater for the proposed addition of between one and three trains per day.

However, the EIS does not contain evidence to support this assertion, nor confirm that the Australian Rail Track Corporation (ARTC) and/or HVCCC will be capable of servicing the RHCP trains and meet cargo assembly times at the port without directly or indirectly impacting on Yancoal's existing and/or proposed trains on the North Coast Railway.

Further, Condition 9b of Schedule 2 and Conditions 6b and 6c of Schedule 3 of the SCM Development Consent (DA No. 23-98/99) limit the number of Stratford product coal trains that can be dispatched from site at night, or occupy the rail loop simultaneously with another train at night. As such, these constraints in combination with fewer and shorter train paths (i.e. as a result of the additional RHCP trains) may compromise Yancoal's ability to meet its required export coal production rate and port contracts.

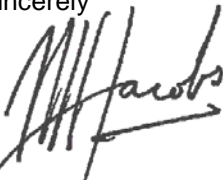
In November 2012, DCPL obtained approval for a modification to the Duralie Coal Mine to extend the hours which the Duralie shuttle train could operate. Prior to this modification, DCPL was often unable to complete enough daily shuttle train movements within the approved operating hours to meet DCM's approved maximum ROM coal production rate (i.e. 3.0 Million tonnes per annum) and blending requirements with Stratford Mining Complex ROM coal for export markets.

Therefore, Yancoal's principle concern with the RHCP is that the proposed additional trains (i.e. up to three trains per day, or six train movements) on the North Coast Railway could regularly directly or indirectly delay one or more of the approved eight (average) daily Duralie shuttle train movements to an extent where operations would be negatively impacted. This would reduce DCM ROM production and/or limit ROM coal blending capability at the Stratford Mining Complex which would negatively impact on the commercial viability of Yancoal's existing DCM and Stratford Mining Complex and proposed Stratford Extension Project.

Any adverse impacts on Yancoal's existing DCM and Stratford Mining Complex and proposed Stratford Extension Project rail movements on the North Coast Railway arising from the RHCP would be a totally unacceptable outcome for Yancoal.

Yancoal thanks the Department of Planning and Infrastructure for the opportunity to make a submission on the RHCP.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mark Jacobs', with a large, stylized loop at the bottom.

Mark Jacobs
General Manager, Environment, Approvals & Community Relations

Enclosures: Political Donations Disclosure Statement.