

7 Forbesdale Close  
FORBESDALE NSW 2422

9 October 2016

The Director  
Resource Assessments Planning Services  
Department of Planning & Environment  
Box 39 GPO  
SYDNEY NSW 2001

Dear Sir

**Rocky Hill Coal Project – Application No. SSD 5156  
Stratford Coal Extension Project No. SSD 4966 MOD1**

I strongly oppose the Rocky Hill Coal Project and the Stratford Mine modification.

Three years ago (October 2013), I wrote a submission opposing the Rocky Hill Coal Project, then waited and waited for the Planning and Assessment Commission to set hearing dates in 2014, which never came. The time just dragged on until early in 2015 the residents of Gloucester were told that Gloucester Resources Ltd had applied for an extension to review its DA/EIS for the Rocky Hill Coal Project.

Two extensions were approved by the Dept of Planning. The Gloucester residents were informed that GRL had ditched the plan for the washery and coal loading facilities at Forbesdale and would approach Yancoal Aust Ltd to strike up a deal to use Stratford's facilities. Hence, the amended DA/EIS was finally put on display in August 2016.

Objections, yes there are many, as a matter of fact the problems regarding the amended DA/EIS appear to have been made worse for the Forbesdale residents, the Gloucester Township and Stratford residents.

Although there will be only three pits (at this stage), the largest and first one will be closest to our homes. The fact that the ROM unwashed coal will now be loaded at the mine site and transported in uncovered BDouble trucks along a private haul road 8kms south to Stratford, will increase the noise and dust pollution.

**Figure E LOCAL TOPOGRAPHY**

GRL's Meteorological Station is situated just North West of the closest mine pit to the Forbesdale rural residential estate. These real time (I presume it is) readings should have a good insight into the direction the pollution will travel.

In FRAG's (Forbesdale Resident Action Group) 2013 submission, wind velocity and directions were recorded in three locations over a three month period which showed proof that the prevailing winds blow predominantly across Forbesdale and northwards up the Avon Valley into the Gloucester township.

**NOISE**

GRL in an advertisement in the Gloucester Advocate (21.09.16), says *"Testing shows that noise levels experienced by the mine's nearest neighbors are not expected to be more than 5 decibels above current background noise levels. To put this in perspective, noise levels at most nearby residencies are not expected to exceed 35 decibels, similar to noise generated by a fan"*. What an absurd statement.

Any decibel incurred by mining above current background noise levels is unacceptable. Forbesdale residents experience noises associated with agriculture and traffic during the daytime hours. For GRL to expect the Gloucester community to believe this spin is highly offensive and demeaning.

GRL also state in the advertisement that there will be "no night time mining i.e. no mining between 10pm and 7am." Does GRL think we all came down in the last shower? I do hope the Dept of Planning will question GRL for misleading the community. Any noise after dusk and before dawn is 'night time'.

Why does this community have to put up with such bizarre statements?

The Gloucester township has not experienced the problems from mine noise like the residents living in close proximity to mining operations such as the Bulga Warkworth Mine. Although GRL state Rocky Hill will not operate 24/7 at the beginning of the mine's operations, there is no guarantee that GRL will not apply to Dept of Planning to increase production in years to come. Although the residents living within 1km of the Stratford mine have constantly reported noise and blasting problems since the mine's operation, they have noticed a difference, since the mine has recently been put into maintenance mode. This is another reason against the Stratford modification to allow GRL to use the washery and coal loading facilities, where apart from the distinguishable noises heard in the past, the Low Frequency Noise now not there, will start up again.

Although stated that the noise may only rise 5 decibels in the mining area, how can GRL expect the residents to accept noise which is now not heard? One cannot put a comfort level on noise unless it is compared to other noise. Forbesdale does not experience noise after sunset. The Bucketts Way is quiet with the exception of a couple of trucks rumbling by but in the Valley there is no constant industrial noise. In summer the crickets sing, cows may bellow, irrigators providing water to crops can be heard but these are the noises expected and enjoyed by living in the country.

Residents cannot relate to mining trucks changing gears when travelling down 200mtrs into the mine pits or the 'beep, beep' of their reversing, although we have been told by one of GRL's staff that residents won't hear any beeping now that mining trucks have been fitted with special arresters. It would be assumed this would be considered a health and safety risk for the workers if they also can't hear whether a huge mining truck is reversing or not.

Another less known aspect of noise in mining, which has not been fully researched by Australian health authorities, is Low Frequency Noise.

Description: **Infrasound**, sometimes referred to as low-frequency sound, is sound that is lower in frequency than 20 Hz (hertz) or cycles per second, the "normal" limit of human hearing. Hearing becomes gradually less sensitive as frequency decreases, so for humans to perceive **infrasound**, the sound pressure must be sufficiently high.

Reports coming from overseas state that living near an open cut coal mine 24/7 can be dangerous to residents' health. In the article below, Dr Pereira from Lisbon's Lusofona University in Portugal has spent nearly 30 years researching the health impacts of Low Frequency Noise.

**Newcastle Herald – 7 October 2016: Expert says low frequency noise cause significant health concerns**

A visiting expert on low frequency noise (LFN) described its impact as being similar to your body being continually punched.

Associate Professor Mariana Alves-Pereira was in Bulga this week talking to residents about the impacts of LFN and how current measurement regimes do not provide accurate data for assessing those impacts.

"Noise is an innate mechanical force – it's like a pressure wave or explosion hitting your body and your body's cells react to that punch. So if you live near a 24/7 source of LFN then it has damages your health," said Dr Pereira.

Read more: <http://www.theherald.com.au/story/4213005/why-mining-noise-can-be-a-low-blow/?cs=305>

### **BLASTING**

Referring back to the advertisement, GRL's description of what does a blast sound like: "A low rumble for a few seconds". God help us! My husband and I have experienced firsthand a 'mild' blast which occurred just 1km from the Duralie Mine. We were visiting friends in their home when without warning there was a blast – the house shook and the windows rattled. The house is on a slab. It was more than 'a low rumble'. Again, GRL are playing down how the blasting will be perceived by the residents of Forbesdale and other housing estates only 3kms from the Rocky Hill mine pit.

Our houses are at risk of being damaged by blasts which have been known to exceed the acceptable limit. Will GRL be liable should pre-inspection reports differ from post-inspection reports done when cracks start to appear after the mine is operational a few years down the track? Will the Department of Planning help to protect our homes in the future and put conditions on GRL or any future mining company operating the Rocky Hill mine to compensate residents whose homes have been damaged by blasting?

### **EXPLOSIVES**

That are Dept of Planning's guidelines for GRL storing 200 tonnes of ammonium nitrate explosives at the mine site? How close is too close to residents of Forbesdale?

### **COAL DUST STUDIES**

Researchers at the University of Melbourne say there is little scientific evidence for current coal dust exposure regulations, following the resurgence of black lung in QLD.

Professor Lou Irving, clinical director of the university's Lung Health Research Centre, said scientists don't know if there is a safe dust level of exposure.

"There are regulations limiting the amount of dust that coal miners can be exposed to, but they have no basis in science," he said.

"We simply do not know at what point exposure to dust triggers lung stiffening, or fibrosis, and we urgently need to address this so we can catch it before it becomes incurable."

**Read more:** <https://www.australianmining.com.au/news/safe-coal-dust-exposure-levels-dont-exist-study/>

Again, residents living in close proximity to mining are at risk 24/7 and do not have the luxury of leaving their premises after mining hours have been worked, as do mine workers.

### **SALT RESIDUES FROM DESALINATION PLANT**

7 tonnes of salt per day will be produced by the Rocky Hill mine but GRL do not state which facility the salt will be transported to. It is not acceptable that this contaminated salt could be mixed with stored water and disposed of in the local creeks and rivers, if GRL cannot find a suitable licenced facility. This salt is not the normal table salt used for human consumption. AGL faced the same problem in regard to produced water and had to transport it to a facility in Queensland for processing – no NSW facility would touch it. Will this extra cost diminish the profitability of the mine? It would appear so.

### **KEY DIFFERENCES APPENDIX 1, PAGE 19**

Under the section regarding labour, it would appear that GRL have allowed Maslen's Dairy to expand to managing 680 dairy cattle grazing on land previously owned by independent cattle producers. GRL has stated that 'Labour volumes used by Speldon (Maslen family) (due to the intensity of dairy production) have increased to date by 2 full time and 5 part time employees, a significant increase'. Why would Dept of Planning approve this mine when it is clear agricultural production can be maintained and grow well beyond the 21 year life of a mine? It is somewhat questionable if GRL will have the incentive or the expertise to return the mined land to the state this agricultural land is in today. It can't be done.

### **REHABILITATION OF MINE SITE**

There is not enough overburden to fill the voids or produce the claimed landform. 20 million tonnes of coal removed. Topsoil 40cm deep over rubble 190 metres deep will not hold water in dry spells.

GRL claim that they will fill in any voids and completely rehabilitate the area to look even better than nature has created. Nature also has a way of proving humans wrong. Common sense says irrigation, without hundreds of years set by natural infrastructure cannot hold the groundwater in place, therefore the land will be rendered unusable for pastures and grazing. What if GRL go into liquidation and the mine ceases to operate? If we use the examples of mines in the Hunter then we cannot believe them. The bond put aside for rehabilitation is never enough. The mining company moves on and leaves the clean up to the taxpayers.

#### **NO STAGE II?**

Should this mine be approved, the dairy in question (Speldon) will have a limited life because the approved Stage II of the Forbesdale exploration REF clearly states exploration will occur on the dairy area and should coal be found to be productive, then this dairy will cease to operate. The Maslen family will have to either find buyers for the herd or move somewhere else. A tragedy for a dairying family which could continue to be an asset for Gloucester in this ideal location for several generations and beyond.

GRL has already earmarked the area north of the proposed Rocky Hill mine for 'Stage Two'. As with all coalmines, when the initial mine is approved, what follows is extension after extension or modification applications. If the coal is there then GRL will mine it. EL6523 extends north up the Avon Valley to behind the township. Also stated in the REF for Stage II Forbesdale, **GRL needs to expand exploration of the initial mine to make it a profitable one.** Even this statement regarding 'profitability' is questionable because looking at the global situation, how far countries can go before they render their productive land useless – they can't grow food in a mine pit and are beginning to plan for alternative energy resources now before it is too late.

It appears that GRL is playing with words, such as there will be no Stage II, however, it is common knowledge that the Dept of Planning has rarely seen a mine which does not move beyond the first approval stage. It is therefore, a conclusion, as soon as GRL is given a mining licence, exploration of Stage II of the Forbesdale Exploration area will continue, followed by application to modify or expand the present mine area, thus sounding the death knell of Maslen's dairy, the destruction of the agricultural land it is on, other dairies and cattle producers' livelihoods north and south of the mine.

#### **MINING COMPANIES CLAIM FOCUS ON COEXISTENCE**

In the most recent advertisement in the Gloucester Advocate (5.10.16) – *Coexistence the focus of visit*, several heavies have gathered together in Gloucester to promote that mining and dairying can co-exist. Steven Galilee CEO and David Frith, NSW Minerals Council, Shaugn Morgan CEO Dairy Connect, two dairymen, Graham Forbes who I understand, owns several properties all totally unaffected by the mine and the Maslen family who sold the dairy to GRL in 2012 and have leased back the land for five years with a further five year option. Unfortunately, Mr Maslen cannot speak out about any concerns he may have regarding GRL's mining activities because of a signed Confidentiality Agreement. Craig Sparks from Yancoal and the COO of GRL, Brian Clifford also got together to '*work with our neighbours to develop best practice farming models to ensure sustainability and longevity*'. Their background is MINING, they are not interested in agriculture.

Coexistence didn't work in Jerry's Plains where Wendy Bowman and her husband were forced to sell their dairies because the mining company at the time, finally admitted that mining and dairying could not 'work together'. The present mine owners, Yancoal has been directed that it cannot expand the mine until either Wendy Bowman agrees to sell her beloved property or dies, then perhaps her children will be prepared to fight for their future livelihood.

#### **NIGHT LIGHTS AND HAUL ROAD**

Gloucester sits in a quiet, rural valley with dark, starry night skies. This will disappear with the lights from the proposed mine in the Avon valley. Even though the mine will not be operating at night for three years, the workers will have shifts until 10.00pm. They will be travelling along the haul road to

and from the mine. GRL states in its amended DA/EIS that no lighting will be needed as movement will cease at 10pm (AT THIS STAGE).

Lights around the mine site area permanently switched on for security reasons, will be visible to residents in the Avon Valley and will glow into the sky. Who wants to close the curtains at night? One would much prefer to look at the moon rising over the Mograni Range or observe the magnificent skyline of stars and constellations at night, tracking satellites travelling effortlessly through the night sky – it is a visual smorgasbord of planets only seen in a totally black sky. The visual amenities will be greatly impaired.

#### **EMPLOYMENT**

GRL has stated in a recent advertisement that up to 75% (60-110 personnel) will be sourced from 'locals'. Also in the advertisement, GRL has stated it considers 'local' to include residents of Old Bar, Taree, Forster, Gloucester, Stroud, etc. so GRL will be looking to hire 60-110 persons from over 80,000 people NOT 5,000 from the old Gloucester Shire Council area. How many Gloucester residents who live, shop, send their children to local schools will actually be employed? Yancoal has stood down hundreds of people from their Duralie and Stratford mines over the last couple years and it would appear there hasn't been a mass exodus from Gloucester of miners looking for jobs elsewhere. Statistics say the majority of mine workers in these two mines were drive in/drive out.

I have not made a reportable political donation.

Yours faithfully



Robin Besier