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14/10/2016

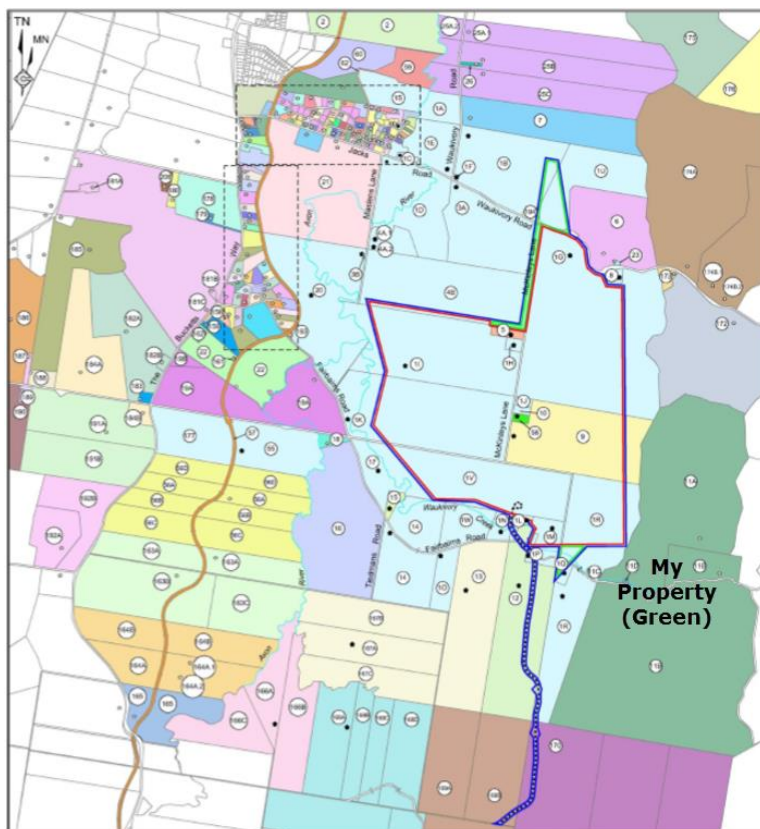
Director – Resource Assessments Planning Services Department of Planning & Environment  
GPO Box 39 Sydney NSW 2001

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

Dear Sir/Madam

**I oppose the Rocky Hill Coal Project and Stratford Mine modification on the following grounds**

**This mine is too close to me, my family, my home and my property.**



I have already lost dollars on the worth of my asset with the expansion of the *boutique* Gloucester Coal Mine on my southern boundary (shown in pink).

With the GRL mine, the value of property has plummeted. My property is my one and only source of superannuation.

Real estate agents advise that we will never realise our superannuation with two active coal mines – Gloucester Coal and GRL on our southern and western boundaries. My retirement funds are seriously reduced and inaccessible.

The potential to capitalise on the property with my planned subdivision is now lost. My property can be accessed both from Fairbairns Road or Bullen Bullen Road. Fairbairns Road used to have a great community feel with a lot of self-funded retirees buying small farms. In fact it had a prestige value and I designed the subdivision to take advantage of that added value. Now between GRL, Yancoal and AGL they own all the properties and that community has disappeared. Fairbairns road is now a mining road (crossed by a huge haul road).

At 66 years of age I can't wait for GRL's 20 years to mine the deposit and realise the value of the subdivision. Assuming they stop at that. Experience has showed us that Gloucester Coal's 8 year boutique mine has drawn out to 22 years and they have another approval for another 10 years.

Apart from my loss of capital land value, I have to endure noise, dust and light pollution and the effects of low frequency noise.

I share a 4Km boundary with the proposed Rocky Hill mine.

Yancoal also owns the land on my southern boundary leaving my property almost land locked.

House to Pit = 2.5Km

House to Rotary Breaker, Loading Bing and Truck Loading Loop = 2.2Km

The edge of my property is 1.2Km from the Rotary Breaker and Loading Bin.

The SW boundary is only 150 metres from the haul road.

For a very small reward to NSW from the small proposed Rocky Hill mine (12.5Mt over 21 years) I have to endure a significant drop in property value.

**We don't want this mine so close to residential areas.**

**One serious reason for refusal is that Rocky Hill is a life threatening risk to workers and my family and livestock.**

Underlying the coal reserves is a thick belt of rhyolite and andesite. This layer has been folded to form the synclinal structure that defines the Gloucester Stroud valley. The dominant rhyolite member can be found out cropping on the edge of the basin which forms the Bucketts mountain to the west of the valley and to the east it forms Rocky Hill, the mountain ridge that divides the mine site and my property. My concern is that by blasting above the igneous layer ground vibrations will transfer along the igneous layer to the out crop at the top of the hill and result in catastrophic disaster. The rock is exposed above the mine site and my property at our boundary. The rock is jointed vertically and horizontally or at shallow angles close to horizontal. Some joints are weathered and there are exposed joints that would make it easy for the large boulders to be dislodged. See photos.

There is a significant risk of some of these boulders rolling down on either side of the ridge – toward my house and equally towards the mine site and all its infrastructure. There are examples of this occurring in the past on both sides of the ridge.

About 10 years ago a large rock slide occurred on the Bucketts which is the western outcrop of the syncline. A significant amount of rock came to a stop just above houses on Bucketts Road. The scar could be seen for several years and is now covered with vegetation. This fall no doubt was brought about by a combination of factors like time, weathering and weather events. However, blasting four times a week could exacerbate the collapse of the rocks along the ridge above the Rocky Hill mine area. Below are some photos of the type of rock outcrop that may be dislodged by blasting.

The following are a few examples of rocks perched on the top of the hill above both the mine site and my property.



This boulder shows the size and the precarious basal joint. If dislodged it is in a line with the proposed mine administration building.











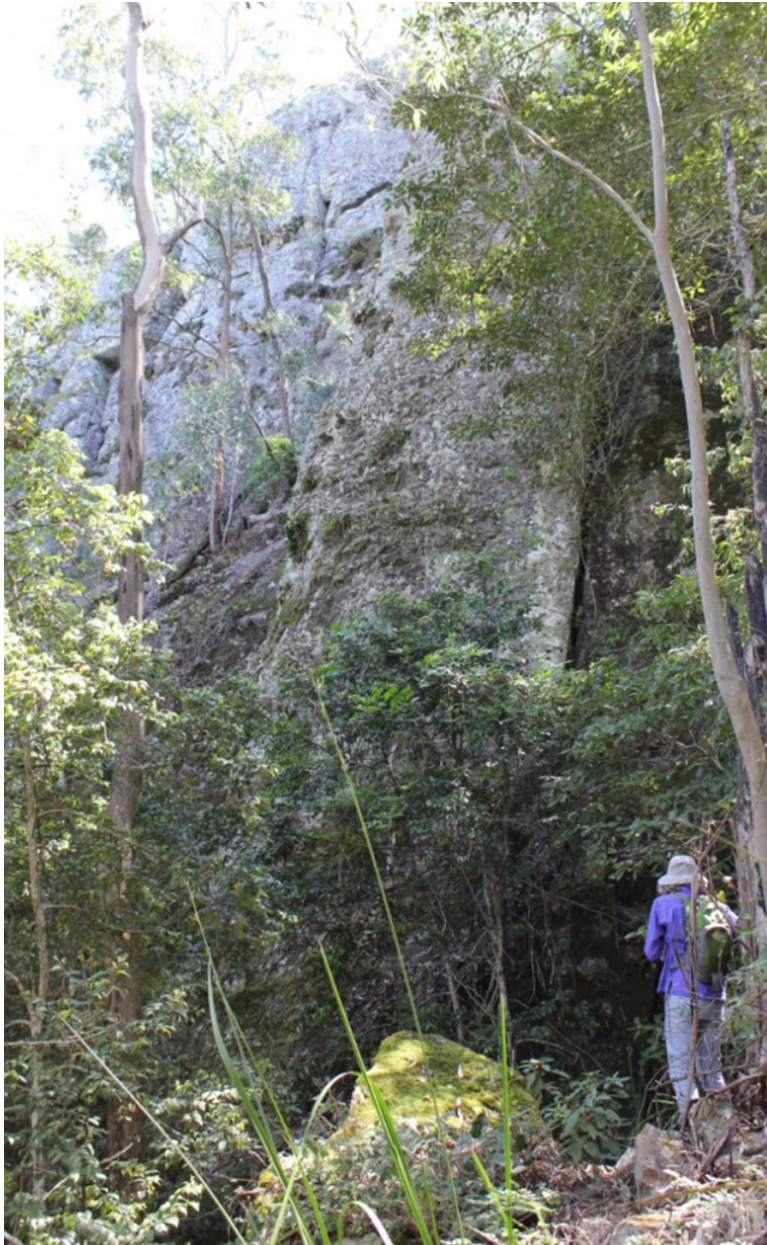




No scale with this photo but you can see the valley floor below and how easy it would be for rocks to roll all the way to the mine site.







This photo shows a vertical rock wall in the order of about 30 metres high. It is more massive than the previous boulders but the photo doesn't show that it is jointed vertically and horizontally and with repetitions of blasting could well dislodge. This wall is above the rotary breaker and loadout bin.

**The mine is not going to save the town, it is a community killer.**

The mines, both GRL and Yancoal, have displaced over approximately 100 small farms and their families which all had a small tractor, implements, hired local contractors and spent money in the town. Many of these small farm owners were self-funded retirees with good disposable incomes. The loss of income to the town has never been factored into any study and I assume would add up to a large revenue over the life of the mine and override the claims of local mine employees spending the equivalent or more than 100 families.



GRL's Amended EIS states it will save the town of Gloucester with employment and money spent in the town. However Stratford Coal has been running for 22 years. In fact the town has gone backwards not forwards over those years. The Chamber of Commerce complain that Yancoal doesn't spend money in the town. The employment of locals is low as most mine employees are drive in drive out. The mines definition of local includes Taree, Forster, Dungog and Newcastle which all remain as drive in drive out.

### **The mine is going to cause serious impacts to the health of Gloucester residents**

This mine is too close to town and residential areas. It is the smallest coal mine in Australia. The town is being asked to carry an unacceptable burden of dust, light, noise pollution and loss of amenity which will affect their health, safety, rural lifestyle, and result in a downgrade of property values.

A large section of the Gloucester Township are in the 5 km mine affected zone.

#### **Impacts from Carcinogenic Particulate Matter**

Environmental Protection Authority recent presentation stated:

- Diesel exhaust declared Class 1 carcinogen (IARC 2012)
- Coal mines consume 86% of all diesel used by non-road industrial equipment in the GMR, which is 57% of amount consumed by entire on-road diesel fleet.
- Diesel engines at coal mines – 11% of PM2.5 in Hunter, 10 times more than on-road diesel
- Annual average PM2.5 exceeded in Muswellbrook in 2012 and 2013.

[http://www.nswmining.com.au/NSWMining/media/NSW-Mining/Events/2014 EC Conference/Adam-Gilligan\\_FINAL.pdf](http://www.nswmining.com.au/NSWMining/media/NSW-Mining/Events/2014%20EC%20Conference/Adam-Gilligan_FINAL.pdf)

Noise, Dust and Blasting already affects Gloucester from Stratford Coal mine 10Km to the south. So GRL's new mine 2 km away will affect us more. I am astonished that GRL's Air quality consultants boast that this mine will be the cleanest in the country. In fact, the town residents have already discovered coal dust in the swimming pool filters from the Stratford mine.

**The latest warning from open cut coal mining is black lung.** This appears to be just the tip on the ice berg and Gloucester does not want this.

**CFMEU Mining and Energy Division – 12 October 2016:** Mining communities throughout Australia are on alert after confirmation of Australia's first case of Black Lung disease in an open cut coal mine worker at BHP Billiton's Goonyella Riverside Mine in Central Queensland's Bowen Basin.

Read more: <http://cfmeu.com.au/first-confirmed-case-of-black-lung-in-an-open-cut-mine>

**Instead of waiting until the mine starts. Then issue warnings to residents to stay indoors because of excess pollution. Reject the mine proposal now.**

### **Lack of Control and Government-Set Criteria for Low Frequency Noise in Rural Areas**

Low Frequency Noise is an issue that worries the local people as we live in a rural environment that is highly susceptible to low frequency noise impact on health. Stratford Coal has approval to mine 24 hours plus the noise pollution from Rocky Hill have no government controls or limits to measure and control the disturbance. There are no limits placed on low frequency noise.

**Proper measurement and systems and protocols for low frequency noise are important to protect the health of Gloucester residents.**

***Newcastle Herald – 7 October 2016:***

*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.*

***.....Dr Pereira recommended exclusion zones of around 10 kilometers from homes and sources of LFN such as open cut coal mines***

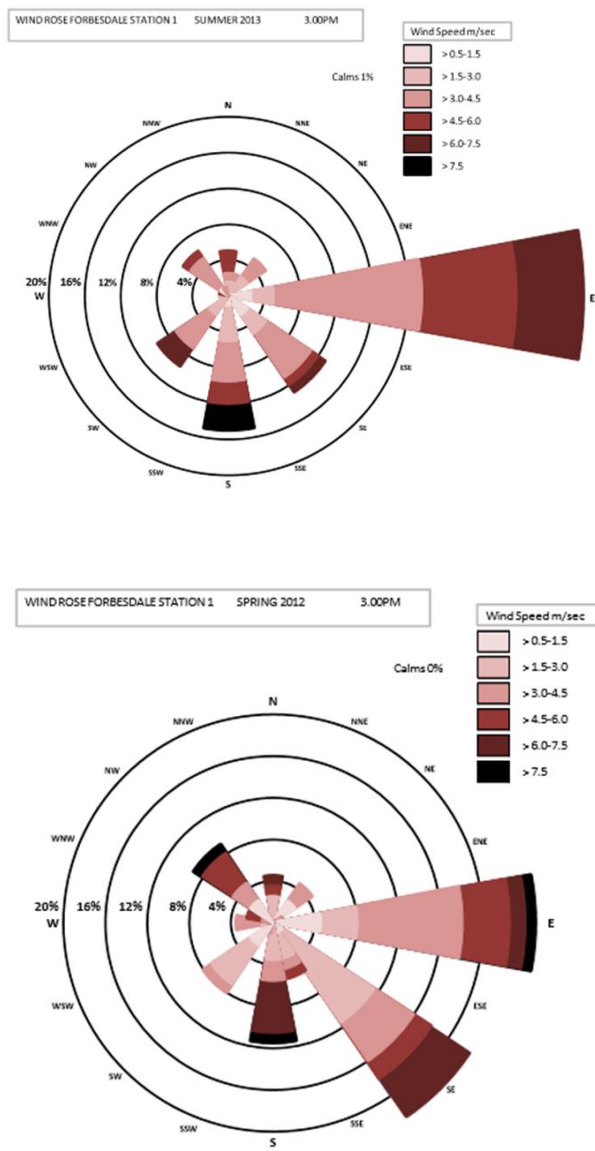
read more: <http://www.theherald.com.au/story/4213005/why-mining-noise-can-be-a-low-blow/?cs=305>

**Consultants modelling of noise and dust pollution inconsistent with actual wind measurements by Forbesdale residents.**

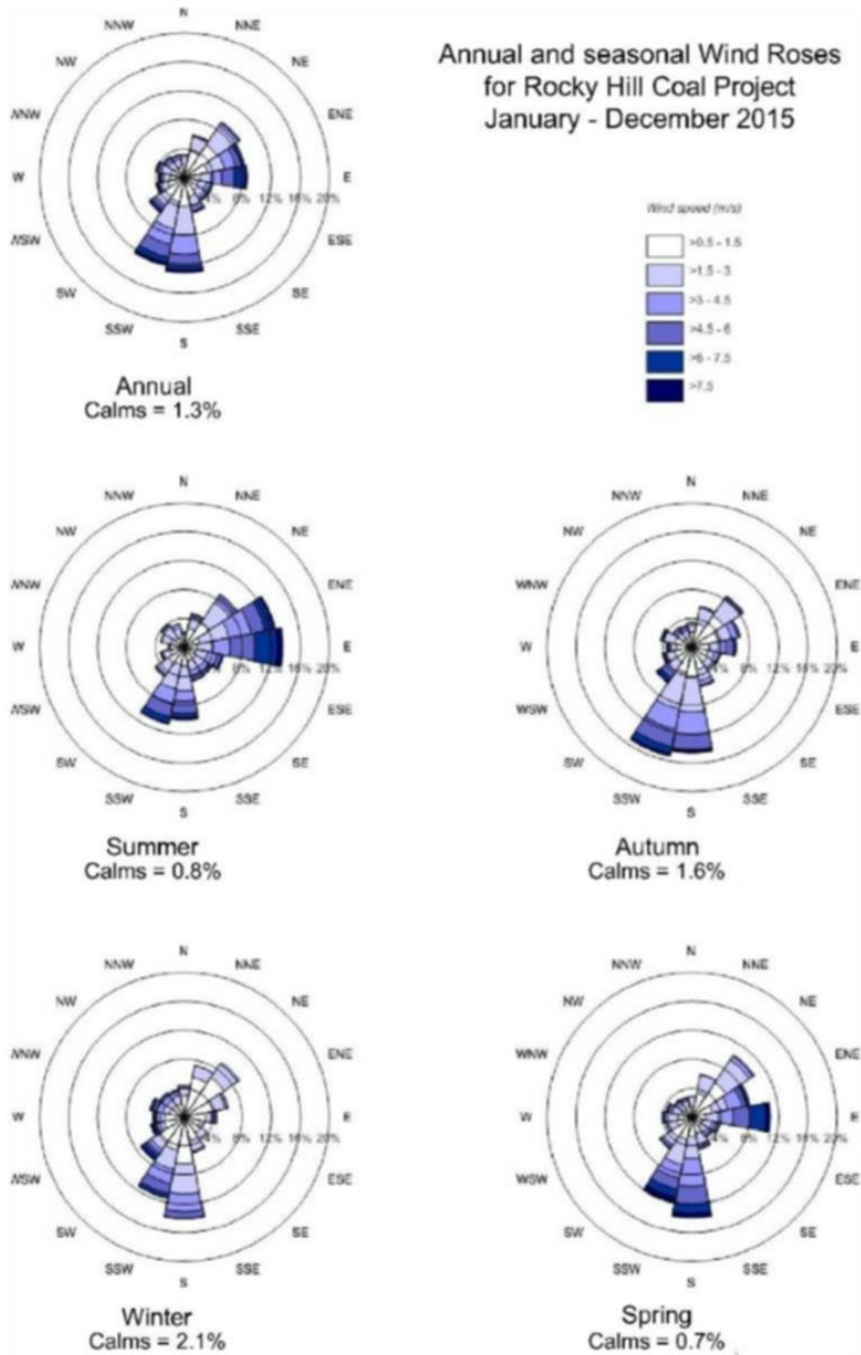
I have been very concerned and challenged by the consultants’ results and modelling for air quality, noise and blasting effects. Below is just two wind roses for summer and spring recorded by the Forbesdale residents and the wind roses that are used by GRL consultants. It would be very disingenuous to use composite wind roses that average data over a larger period, which seems to be the case. Modelling should be based on winds blowing at peak work times to produce a better understanding of what is really happening. The current models on air quality and noise at best are very mine-friendly.



The Forbesdale residents have a detailed representative set of data to dispute what GRL is doing or not doing. I just enclose two examples to demonstrate my concerns with what GRL consultants may be misrepresenting data to dumb down results.

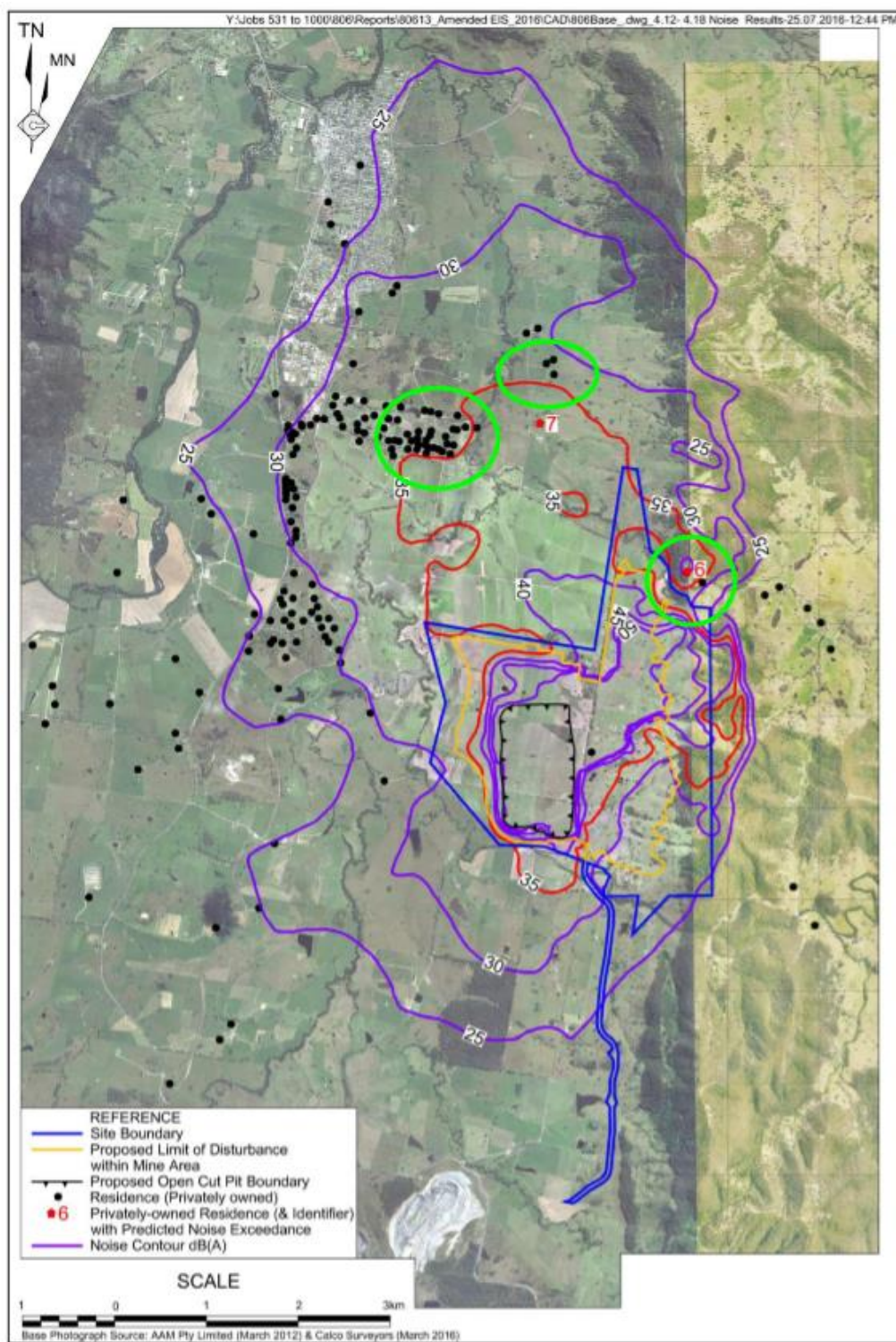


# Annual and seasonal Wind Roses for Rocky Hill Coal Project January - December 2015



Source: Pacific Environment (2016) - Figures 5.4 & 5.7





Just one example is the 35dB(A) noise contour which narrowly misses homes (see lime green circles) and in the case of the Jacks Road subdivision (lime green circle) the contour mysteriously bends back upon itself to avoid a large number of residential homes. This modelling really is a mine-friendly result.

I hear mine noise from Stratford and dust is deposited at our house and in our rainwater tanks - that mine is 6-10km away. I am very sure that the GRL mine will be much more invasive than suggested by the consultants modelling.

**I have no faith in the consultants modelling and suggest the government departments question their conclusions.**

If the consultants' models are the basis for mine approval then who is liable if those models are wrong – the government, the mine or the consultants?

## **Mine Viability**

80% percent of the Gloucester people don't want this mine.

The previous Gloucester Council rejected this mine.

Even the Chamber of Commerce who support mining say it is too close to town.

In fact the original EIS was about to be rejected and GRL re worked the proposal and resubmitted it as an amended EIS.

Now the newly formed Mid Coast Council have rejected this coal mine.

The people of Gloucester and greater Manning river area will fight this mine to the end.

The NSW Government needs to invest in renewables, particularly in rural areas where employment is low. Towns, like Gloucester could be embracing the new world of solar, thermal solar, biomass, wind and hydro. So many options with huge benefits, like, reduced carbon emissions, lower power bills, regional economic development and stable job creation.

Gloucester's clean, green image needs to thrive and grow. We want industries that enhance the rural area and promote our claim to fame of being the gateway to the Barrington Tops World Heritage area.

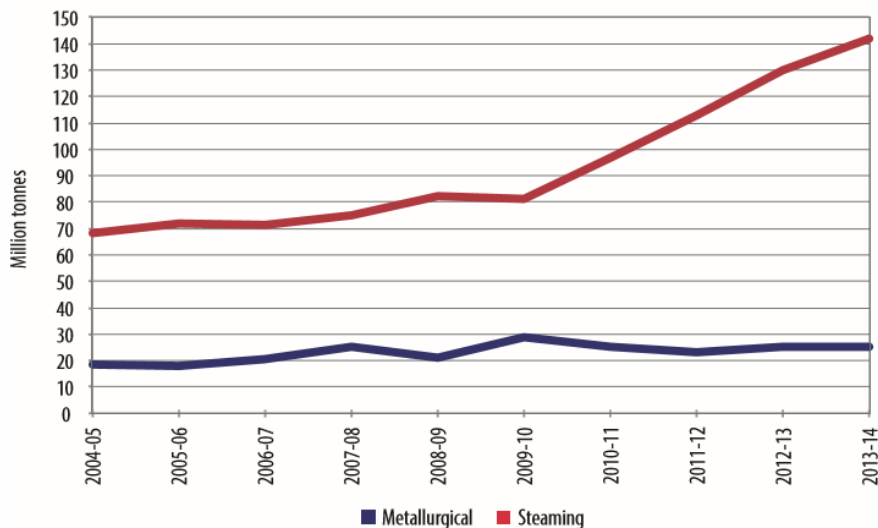
**The people of Gloucester do not want to be a mining town.**

Gloucester could be the new renewables hub instead of following an out dated industry like coal. Isn't it about time we followed the rest of the world into the 21st century?

When the Stratford mine slowed operations and eventually stopped production, many workers were laid off. This illustrates that mining is not a sustainable industry. When the price of coal goes down then mining companies have no responsibility to workers or the local areas. They just cease operations. This is not what we want for Gloucester.

This mine should be rejected on the small scale of the deposit, only 12.5Mt of coking coal. Department of Industry Resources and Energy show that in NSW there is an excess of **3.8Billion Tonnes** of Coking Coal in **existing** Mines. There is no benefit to opening this small mine which is in the wrong location.

**Graph 9: Coal exports from NSW by type**



NSW exports approximately 25.5Mt annually over the last 10 years and that demand hasn't changed even though GRL talk about a mysterious shortage of coking coal and an increase in demand (see chart above). The real surge in demand and in price was in steaming coal. It was a rare phenomenon that steaming coal became worth more than coking coal. So by allowing Rocky Hill to add 0.6Mt a year to the supply the net demand of 25.5Mt won't change. Any increase in coking coal will affect the existing suppliers which will result in a lowering of price in coking coal not an increase in price. That means there won't be additional royalties to the state.

The state doesn't need this mine nor will it derive additional income.

This mine is a high risk to the Gloucester area and low or no reward for the state. In fact it would be a risky gamble in allowing this mine to open.

### **Steel from Natural Gas**

The following recent article from the United States where they are producing steel with natural gas, suggests that the demand for coking coal will fall not rise as GRL would like us to think.

Extract from "The Hamilton Spectator".

*"A process called direct reduced iron uses natural gas to concentrate iron ore into pellets within a furnace that requires less, or in some cases, no coke, says steel expert Peter Warrian of the University of Toronto.*

*The process is less expensive and about 21 million tonnes of steel in the world is made this way now, says Warrian.*

*Steel companies are making big investments in developing the technology, he said.*



*"In the next 10 years, it will replace blast furnaces."*

*Bruce Steiner, president of the American Coke and Coal Chemicals Institute, says many integrated steel and iron companies are turning to natural gas over coal because it's both cheaper and more abundant than coal. That trend has especially taken hold in smaller operations overseas, where coal must be shipped in".*

*Also "These days, the main concern is air emissions, says Lynda Lukasik, executive director of Environment Hamilton. Older coke ovens tend to emit toxins, including cancer-causing chemicals, outside its stacks, something environmentalists call "fugitive emissions."*

As existing metallurgical coal mines chase reducing demand for coking coal, prices will fall and Rocky Hill's viability is dependent on increasing coke prices and increasing demand. The Department of Industry Resources and Energy has predicted that coking coal will fall \$80 per tonne in 2017.

Rocky Hill is not needed and in fact by rejecting the proposal it could save GRL and it's 82% off shore investors a lot of time and money.

**The question is, why would the Government approve a mine that is going to be paying so little to the coffers of NSW?** Gloucester does not need this mine.

**Do not approve the Rocky Hill Coal Project.**

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### **Stratford Coal Extension Project – Application No SSD - 4966 MOD1**

This application should be rejected on the following basis:

- Trucks with 48 wheels carrying 60 tonne of ROM every 6 minutes on a 10km haul road and an empty truck returning will create dust and noise, especially in the unsealed 4.5km section in Stratford mine lease area. This Haul road should be sealed all the way to the stock pile at the CHHP.
- The haul road and associated heavy traffic increases the noise for local farms and Stratford village people who have already suffered 22 years of noise and dust.
- Stratford Coal intend to cross Wenhams-Cox road, a public road. It should be an underpass or overpass. Stratford tried to cross Bowens Road and was made to build a sealed road around the problem. There is no way around so an under/over pass should be built.
- The haul trucks will create noise and dust for my family and I don't want it.

**This mine should not be approved**

Yours faithfully

Anthony Berecny

I have not made a reportable political donation