

**PJ & EM Warmoll
&
PJ, DJ, LME, LF Warmoll & AM Waugh
5538 Kamilaroi Highway
BREEZA NSW 2381**

23 April 2013

Director Mining & Industry Projects
Department of Mining & Infrastructure
GPO Box 39
Sydney NSW 2000

SUBMISSION
ENVIRONMENTAL IMPACT STATEMENT
PROJECT: WATERMARK COAL PROJECT

Attention: Steven O'Donoghue
Per email: stephen.o'donoghue@planning.nsw.gov.au

Please accept this as a submission in response to SSD-4975, Watermark Coal Project Environmental Impact Statement on behalf of PJ, DJ, LME, LF Warmoll & AM Waugh and E M Warmoll.

As indicated in Figure 3.4: Legend for land ownership maps (page 14 of Section Air Quality and Greenhouse Gas Impact Assessment G) we are represented as land owners 30, 31 and 32. (See attachment A)

As shown in Figures 3.2, 3.3 and 3.4 of Section Air Quality and Greenhouse Gas Impact Assessment G we are among the "rural receptors" located close to the project boundary. (See Attachments B and C)

Our family operates a vertically integrated agribusiness.
Our operations include:

- Grain, legume and vegetable production
- Beef cattle production
- Seed cleaning, processing and packing
- Product marketing

We produce high quality Australian grain, legume, vegetable and beef products for the domestic and export markets.

A large portion of the mixed cropping enterprise is Certified Organic as is the seed cleaning, processing and packing plant. This plant is also an AQIS Accredited site. Copies of our current Australian Certified Organic

Certificates of Organic Compliance plus our AQIS Registration are enclosed. (See Attachments I, J and M)

We wish to bring to your attention our strong concern that the main premise on which the EIS analysis and prediction of potential risk is based *...that of predominant wind direction and speed....* is not correct.

Section 5.1 of the Air Quality and Greenhouse Gas Impact Assessment G (specifically 5.1.1) deals with Local Wind Data.

The EIS states as part of its findings that "On an annual basis, winds are predominantly from the southeast and east southeast...." (Page 37 of the EIS). (Effectively discounting the effect from the west).

We do not argue with the methodology that was used. But we strongly state that the use of data gathered from one (1) year does not indicate the true picture and is totally in contradiction to the Australian Bureau of Meteorology (BOM) long term (approximately 130 years) published data, substantiated by our experiences during 51 years of residency in the potentially affected area.

We experience a high volume of wind from the west, north west and south west especially in the windy months July through to November. Indeed it is winds from the west, north west and south west that have the potential to have a severe impact on our properties and operations.

We note that the data provided with the EIS indicates minimal westerly influence and that the wind data indicating westerly influences provided from the Carroona Feedlot site has been excluded from the EIS.

Please also note that the BOM data shows that the winds from the westerly direction gust at 40 kilometers plus more often than that of winds that are received from the south easterly direction.

The BOM wind data tells us that over the time period of the proposed mining activities there is extreme risk of significant impact on our properties and operations which could threaten our operational viability. The wind data provided in the EIS appears to be in contradiction to that of the BOM. We would like to point out that BOM is a pre-eminent climate science organization

Therefore we request that you acknowledge receipt of this BOM wind data which is collected at the nearest, to the Shenhua Proposed Mine, sites – Gunnedah and Tamworth. (See Attachments F and G).

Wind Data.

The following wind reading charts are provided as substantiation.

Australian Bureau of Meteorology Gunnedah Pool weather station that has operated for many decades.

- 3PM Observation for July averages 1877 to 2010 (1,421 Observations)
- 3PM Observation for August averages 1877 to 2010 (1,465 Observations)
- 3PM Observation for September averages 1877 to 2010 (1,418 Observations)
- 3PM Observation for October averages 1877 to 2010 (1,517 Observations)
- 3PM Observation for November averages 1877 to 2010 (1,509 Observations)
- 3PM Observation Total Observations period 1877 to 2010 (17,299 Observations)

Australian Bureau of Meteorology Tamworth Airport weather station

- 3PM Observation for July averages 1992 to 2010 (549 Observations)
- 3PM Observation for August averages 1992 to 2010 (535 Observations)
- 3PM Observation for September averages 1992 to 2010 (516 Observations)
- 3PM Observation period February 1992 to September 2010 (6,185 Observations)

Personal Experience

Between us we have had continuous residency at Breeza since 1962.

Phillip and Elizabeth Warmoll also lived on a section of the actual site of the proposed mine for 13 years, (See Attachment E) and can state that there are regular significant and at times severe winds from the west, south west and north west over that section of the project area. In that 13 years they had large amounts of Tumble-weed and Blow Away grass blowing into their yard and swimming pool also smothering the western fences of that property on a regular basis

All of our holdings have experienced severe storms that came from the west. These storms caused damage to farm infrastructure, houses and gardens. Damage caused by these events includes:

- Sheds destroyed
- Roofs blown off houses
- Air conditioning unit being ripped off a roof
- Water entering houses
- Mature trees badly damaged with large branches torn off and some mature trees uprooted entirely.

Much of this damage has necessitated repairs under insurance and in some cases total write offs – all of which can be substantiated and would appear in insurance industry statistics.

Two recent bushfires which threatened the Breeza village (destroying some buildings), verifiable from Rural Fire Service sources, were intensified by heat driven westerly winds, adding to our body of evidence that westerly winds are regular, strong and unpredictable.

Mr. Peter Middlebrook has operated an aerial spraying business based on Liverpool Plains for decades. He is highly respected, and is in a position to provide credible weather, particularly wind, data for the entire region. Peter has provided his input into the EIS findings.
(See Attachment N)

Margaret Jenkins and Graeme McLaren have lived on our farm for more than 20 years, and know the weather patterns very well. They have concerns about a number of aspects of the project.

Long term residents in this area look to our weather from the west as storms and violent winds come from this direction as it does in most of south eastern Australia.

Summing up on Wind Direction

The BOM data provided by us and our 51 years, of living here observations, clearly show that we do receive significant and regular winds across the entire wind speed range (including 40 Km per hour plus) from the west, south west and north west and we request that this be acknowledged for the purposes of reviewing the findings of the EIS.

It follows that the planned mine development when examined in conjunction with the wind direction as demonstrated by the more detailed data provided by us and the proximity to our operations - these westerly direction winds present a much greater risk of significant impact on us than presented in the EIS.

Potential Adverse Effects

Threat to our operations

Our operations involve mixed cropping over most of the properties. These crops include grain, vegetable and legumes. In addition at the property nearest to the proposed mine site (adjacent to site 32C) we have a seed/grain grading and packing complex. This complex comprises a grain cleaning plant, seed polishing plant, packaging plant, 32 silos, weighbridge, farm workshops and office and wool shed.

Wind driven dust or pollutant contamination of our farming production areas and the processing complex would adversely affect us as below:

Mixed Cropping and Vegetable Production.

We have Certified Organic Status which means that we sell into a very selective and specification driven market. A number of our customers have been clear that were our crop to suffer even a very small amount of dust or other pollutant contamination it would be rejected. Further our organic status would be threatened. (See Attachments L and O)

Seed and Grain Grading and Packing

Our grading and packing operation also has Certified Organic Status with the same risks imposed by dust and other pollutant contamination. Added to this, the grading and packing operation is partly geared to export (specifically Japan) which places extremely strict specifications on particulate contamination. We are an AQIS registered facility. (See Attachment M). Rejection of a shipment could prove ruinous for our business.

Community Impacts

Although we do not speak for the community we are long term members of the Breeza community having occupied land to be affected by the mine development since 1962. Therefore with regard this section we speak as land owners and members of the local community.

The house Phillip, Elizabeth and their family live in is located at the very edge of Breeza village (approximately 200 meters from the first house entering the village) and we own 4 other houses throughout our properties

We see potential harmful impacts as follow.

Contamination of Water, Soil, and Air

All residences on our properties, and our grading and packing facility which is staffed 6 days per week, use rain water as their sole water supply. Windblown contaminants would render this water undrinkable.

Incidents that cause contamination would have a serious negative impact on us and the residents of the Breeza village, and arrangements should be in place prior to commencement of mining activities for mitigation, remediation and/or compensation to residents in the case of incidents. At various stages through the expected life of the mine works are planned for areas very close to the village. Please note that when the westerly wind is blowing it blows directly into the Breeza village and our farm.

Affects of Sound, Blasting, and Other Emissions

There is potential for significant impact on ourselves and the residents of Breeza village by excessive sound and blasting. Once again arrangements for mitigation, remediation and compensation should be in place prior to commencement of mining activities.

The potential for harmful levels of Nitrous Oxide, Carbon Monoxide and Sulphur Dioxide really alarms us as does the effect of excessive noise generated by 24 hour seven days per week construction and operations.

In fact Site 32C is the only residential site to reach toxic harmful levels as detailed in the EIS for Nitrous Oxide (remembering that our processing complex is directly next to Residence 32C).

Affect on Visual Impact

We note that in the EIS the location of Overburden Emplacement Areas is represented as a method of screening the active mining area from view.

We also note that for many years of the expected life of the mine these Overburden Emplacement Areas will be clearly visible from the Kamilaroi Highway including from our farm and Breeza village.

It should be said that Overburden Emplacement Areas themselves are unattractive, and that to an average viewer the appearance of an Overburden Emplacement Area is little different to an Active Mining Area. In fact in many cases the overburden storage is more obvious than the mine itself (with the mine being below normal ground level and the overburden being tens of meters above normal ground level).

If our words do not clearly convey their intended meaning I would suggest that a group of average viewers be asked to contribute comments to this EIS following an inspection of what appears to be a similar arrangement along the highway from Muswellbrook to Singleton, or indeed the road from Werris Creek to Quirindi.

This is an area of mining operations that should be thoroughly planned with an eye to providing the maximum protection throughout the life of the mine - preparation; active mining; overburden emplacement; and site rehabilitation

Please remember that we and all others in our local community live next to this proposed open cut mining project.

World's Best Practice (WBP)

We commend Shenhua Watermark Coal for adopting WBP but note that this is the claim made by virtually all coal project proponents in Australia.

From discussions with mine operators and mine managers it could be said that WBP proves quite effective under normal conditions. Unpredictable, and abnormal or severe weather conditions such as we experience would render WBP irrelevant at those times and leave our community and properties contaminated.

We raise the scenario where gusting westerly winds blow sometimes for weeks at a time...and point to the following facts from the EIS

- The planned coal stockpile area (up to 600,000 T, page 28 of Air Quality and Greenhouse Gas Impact Assessment G) lies due west of our properties and the Breeza village.

- Reject coal fines and reject coarse coal is planned to be "co-disposed of with overburden". (per page 20 of Air Quality and Greenhouse Gas Impact Assessment G) Once again, for many years of the project life overburden storage is planned to be located due west and/or south west of our properties and the Breeza village.
- Given that only 1% of the Gunnedah Shire area has slope of more than 15% and the majority being "generally flat", once contaminants take flight the wind will carry them and wind gust strength will dictate where they land.

The combination of stored and moving materials and the verifiable data showing that significant wind comes from westerly and south westerly directions will indicate that under extreme or unpredictable conditions the location of our properties and the Breeza village puts them at risk of contamination.

Conclusion

We will not accept any climatic data not supported by the Australian Bureau of Meteorology, repeating that the issue of wind data is the premise for our rejection of EIS findings.

Attachments with Submission to Shenhua Coal Project Environmental Impact Statement

Attachment A – 1 page

“Figure 3.4: Legend for land ownership maps”

This allows for our properties to be easily reconciled to the EIS

Attachment B – 1 page

“LOCATION OF OUR PROPERTIES”

This shows the location of our properties in relation to the project

Attachment C – 1 page

“LOCATION OF OUR PROPERTIES WITHIN THE BREEZA VILLAGE”

This shows the location of our properties in relation to the village confirming that we have a presence within, and are part of, the community in addition to operating a farming and food processing enterprise.

Attachment D – 1 page

“LOCATION OF HOUSES ON OUR PROPERTIES”

This shows that our property represents a number of potentially affected residents of the community.

Attachment E – 1 page

“LOCATION OF BROWNS CORNER HOUSE IN WHICH P & E WARMOLL LIVED FOR APPROXIMATELY 15 YEARS”

This supports our view that we have credible personal experience with observing wind and other climate patterns that will have an effect on the project area and surrounding region.

Attachment F – 4 pages

“Australian Bureau of Meteorology 3PM Wind Observations”

Gunnedah Pool 1877 to 2010 (July Mean) A total of 1,421 Observations

Gunnedah Pool 1877 to 2010 (August Mean) A total of 1,465 Observations

Gunnedah Pool 1877 to 2010 (September Mean) A total of 1,418 Observations

Gunnedah Pool 1877 to 2010 (Whole Year Mean) A total of 17,299 Observations

Attachment G – 4 pages

“Australian Bureau of Meteorology 3PM Wind Observations”

Tamworth Airport 1992 to 2010 (July Mean) A total of 549 Observations

Tamworth Airport 1992 to 2010 (August Mean) A total of 535 Observations

Tamworth Airport 1992 to 2010 (September Mean) A total of 516 Observations

Tamworth Airport 1992 to 2010 (Whole Year Mean) A total of 6,185 Observations

Attachment H – 4 pages

“POTENTIAL PARTICULATE FLOWS DIRECTION YEARS 1, 2, 5, 10, 15, 21, 25, 30”

These provide a visual guide to the potential particulate flows that could affect our properties through the various stages of the project. We note that in line with our position that the wind data has been greatly underestimated, it is easy to imagine potential particulate flows in any of the years and stages of the project having a devastating effect on our properties and the Breeza village.

Attachment I – 1 page

"Certificate of Compliance- JF Warmoll & Co

This is our current Australian Certified Organic Certificate of Compliance as an organic grower of grains and legumes.

Attachment J – 1 page

"Certificate of Compliance- Breeza Seeds

This is our current Australian Certified Organic Certificate of Compliance as an organic processor of grains and legumes.

Attachment L – 4 pages

Letters from a number of J F Warmoll & Co and Breeza Seeds Pty Ltd customers;

- Vitasoy Australia Products Pty Ltd
- Mara Global Foods Pty Ltd
- Wholegrain Milling Company Pty Ltd
- Hakubaku Agri Pty Ltd...representing Hakubaku Co. Ltd of Japan who are a major Japanese noodle manufacturer

These letters confirm the risk to our operations and viability in the event of dust or other pollutant/s contaminating our product while growing, harvesting, or processing and packing.

Attachment M – 2 pages

Australian Quarantine and Inspection Service Audit Report Lead Sheet

This confirms our status as an audited and registered Export Registered Establishment (ERE). In the event of dust or other pollutant/s contaminating our product while growing, harvesting, or processing and packing our status as an ERE would be at risk, again putting at risk our operations and viability.

Attachment N – 4 pages

Letter from Peter Middlebrook

Middlebrook Air Operations has operated an aerial crop spraying business from the Liverpool Plains for decades. He is well placed to provide credible data on the local climate including wind as it is a critical aspect of his operations.

Attachment O - 1 page

Letter from Michael Holford-Australian Certified Organic

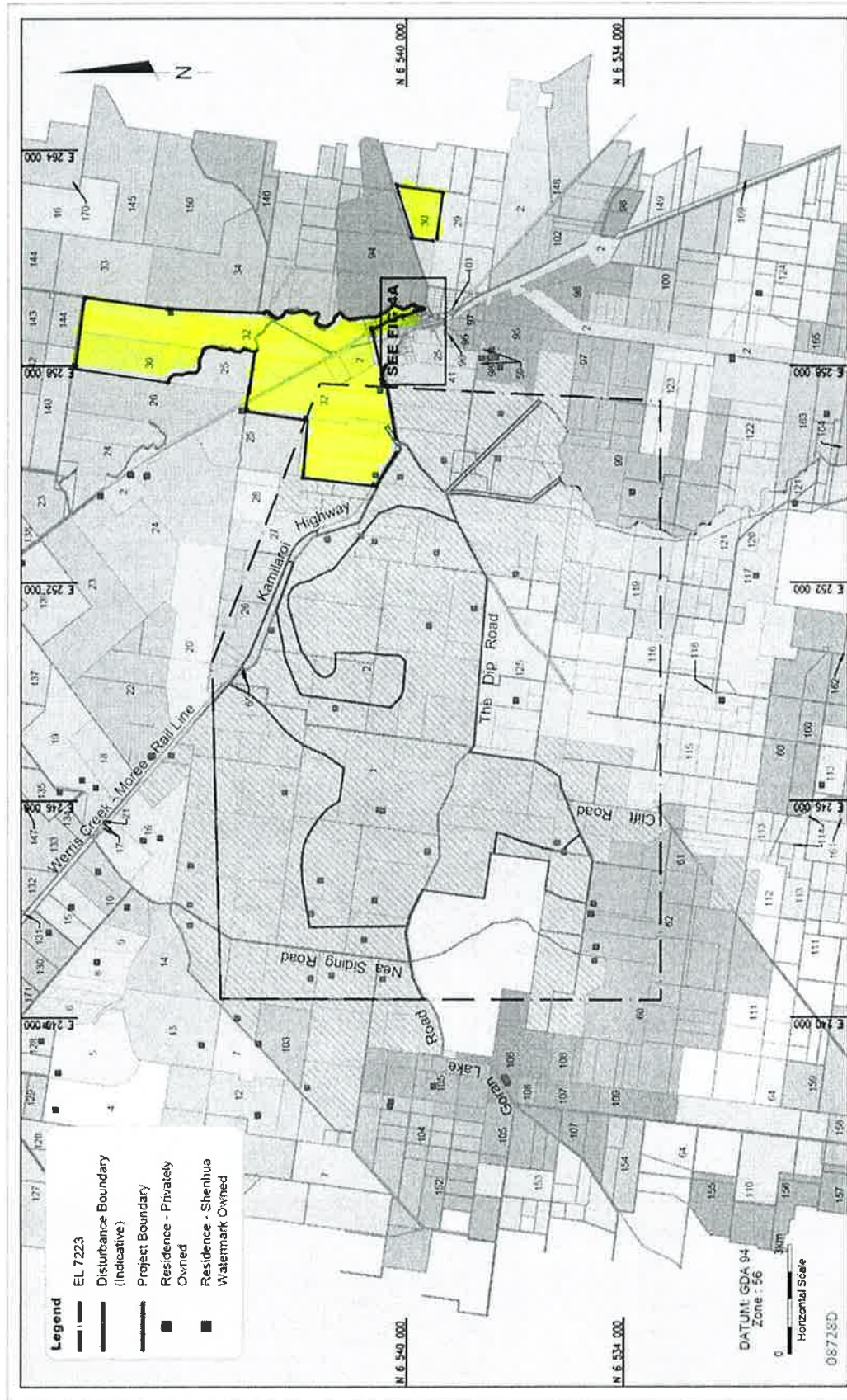
This letter demonstrates that in the event of contamination our status as certified organic producers would be threatened.

Attachment P – 1 page

Letter from Margaret Jenkins and Graeme McLean who have lived on our farm for more than 20 years.

1	Shenhua Watermark Coal Pty Ltd	47	CA Griffiths	83	WR & SG Steedman	140	EC Riordan
2	Crown	48	MD Neave	84	WTA Craig	141	JJ Warner & JM Mackay
3	Telstra Corporation Ltd	49	GR Neave	85	ST, JW & NL Craig	142	C Beilenger
4	Bkl, MA & CB O'Halley	50	DR McVeigh & WA Lewis	86	MJ Parry	143	Lyne Pastoral Co Pty Ltd
5	LJ Sedran	51	BW Dunstan	87	AL Pursehouse	144	HR Hicks
6	KK & MR Picton	52	BM Pepper	88	AL & CI Pursehouse	145	BJ & JJ McNamara
7	WJ & JA Picton	53	R Hierocera & B Cockenill	89	Pursehouse Properties Pty Ltd	146	CC Alston
8	WH & PG Schubert	54	HJ Lickonish	90	Pursehouse Investments Pty Ltd	147	Paul Ramsey Agribusiness Pty Ltd
9	DE & EC Mirov	55	AGA Auctions Pty Ltd	91	Boala Ltd	148	MJD Bonner
10	RA & AE Fullwood Pty Ltd	56	Acrobatic Pty Ltd	92	Hollan Pty Ltd	149	WTA & P Craig
11	The Cedars Pty Ltd	57	JB, SW & WW Clift	93	Fordham	150	LM Sulman
12	Kallima Holdings Pty Ltd	58	W Clift	94	Piyavodia Pty Ltd	151	SJ & MA Kelly
13	PR & DM Gibbons	59	DT Clift	95	Lochiel Park Pty Ltd	152	Singstone Pty Ltd
14	JR & NE McNamara	60	RS & A Clift	96	AR Delve	153	Rarene Pty Ltd
15	NR Saures	61	RS Clift	97	Byrwin Pty Ltd	154	BS Kelly
16	MA & LL Latham	62	M Clift	98	BJ Kelly & PG Calbert	155	KJ & CM Kelly
17	NSW Grain Corporation Ltd	63	W, S Clift & J Cock	99	Rejo Pty Ltd	156	KJ Kelly
18	JR Lyle	64	PK Clift & MR Lane	100	Quimili Pty Ltd	157	Grein Pty Ltd
19	SB Lyle	65	LM Tregenza	101	Public Council Road	158	J & NP Malden
20	Clearpine Pty Ltd	66	KM Donnelly	102	Single Tree Pty Ltd	159	Nikon Pastoral Co Pty Ltd
21	Nullabeen Pastoral Co Pty Ltd	67	SJ Smith	103	Profour Pty Ltd	160	M & KA Clift
22	AR Riordan	68	T Smith	104	GS Norman	161	Carbon Minerals NL
23	Kalori Pty Ltd	69	NE Hutton	105	Birraava Pastoral Pty Ltd	162	JBS Australia Pty Ltd
24	RE & SM Baker	70	G Cohen	106	CJ & PA Duddy Pty Ltd	163	WH & EC Ryan
25	GJ Baker	71	NE King	107	CJ Duddy	164	RJF Cohen
26	JD, Nlt & DJ Tudgey	72	NB & ME King	108	VR Vescio	165	MJ & NG Bradfield
27	DJ Tudgey	73	ARR O'Rourke	109	Rossman Park Pastoral Co Pty Ltd	166	RC, WP Barnett & WJ, JK Menick
28	DJ & JM Tudgey	74	LL Cameron	110	BA, NJ & GC Evans	167	KM & HJ Fulwood
29	PJ, DJ & LM Varmell	75	W Johnson	111	MC, WP & WA Burt	168	AH Craig
30	PJ, DJ, LMIE, LF Warmell & AM Waugh	76	W Johnson	112	WA & MC Burt	169	DR & DW Frankham
31		77	HG Brown	113	SL & MJ Piper	170	PG & C Mahoney
32		78	PH Hicks	114	G Clift	171	SA Shannon
33		79	NI Wright	115	BA & KS Pryor		Not Searched Beyond 5km Buffer
34		80	AA Mendoza	116	KK & MR Picton		
35		81	SJ & SC Ryan	117	WJ & EL Le Cornu		
36		82	ITT & VL Rowney	118	PY & DM Hubbard		
37		83	KD & RM Sampson	119	JA, BP, JH & HA Middlebrook		
38		84	GL Matthews	120	CL & WK Manning		
39		85	WR Matthews	121	Sandhurst Trustees Ltd		
40		86	S Griffin	122	HY & GG Hubbard		
41		87	SG Carr	123	PK Baker		
42		88	BF Manning	124	Hamblin Pastoral Co Pty Ltd		
43		89	RC & LA Wiles	125	Kaythree Pty Ltd		
44		90	PJ & GD Taber	126	Woneena Pty Ltd		
45		91	BT O'Keefe	127	Camilleri Farms Pty Ltd		
46		92	RJ Nutbeam	128			

Figure 3.4: Legend for land ownership maps



"LOCATION OF OUR PROPERTIES"

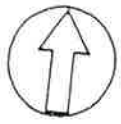


Figure 3.3: Location of private and Shenhua Watermark owned receivers located in Breeza

"LOCATION OF OUR PROPERTIES WITHIN BREEZA VILLAGE"

ATTACHMENT "D" "LOCATION OF HOUSES ON OUR PROPERTIES"

NORTH



Public Rd ———

Power Lines ———

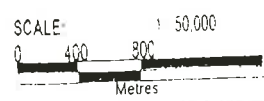
Pump site :

BOUNDARY OF EL 7223



"LOCATION OF HOUSES ON OUR PROPERTIES"

SURVEYOR: BRUCE BARTON



LEGEND:

Field

FOUNDA

WATER COURSE

WELL

WELL

CHANNEL

TREES

WATER STORAGES

ADJACENT LAND USE

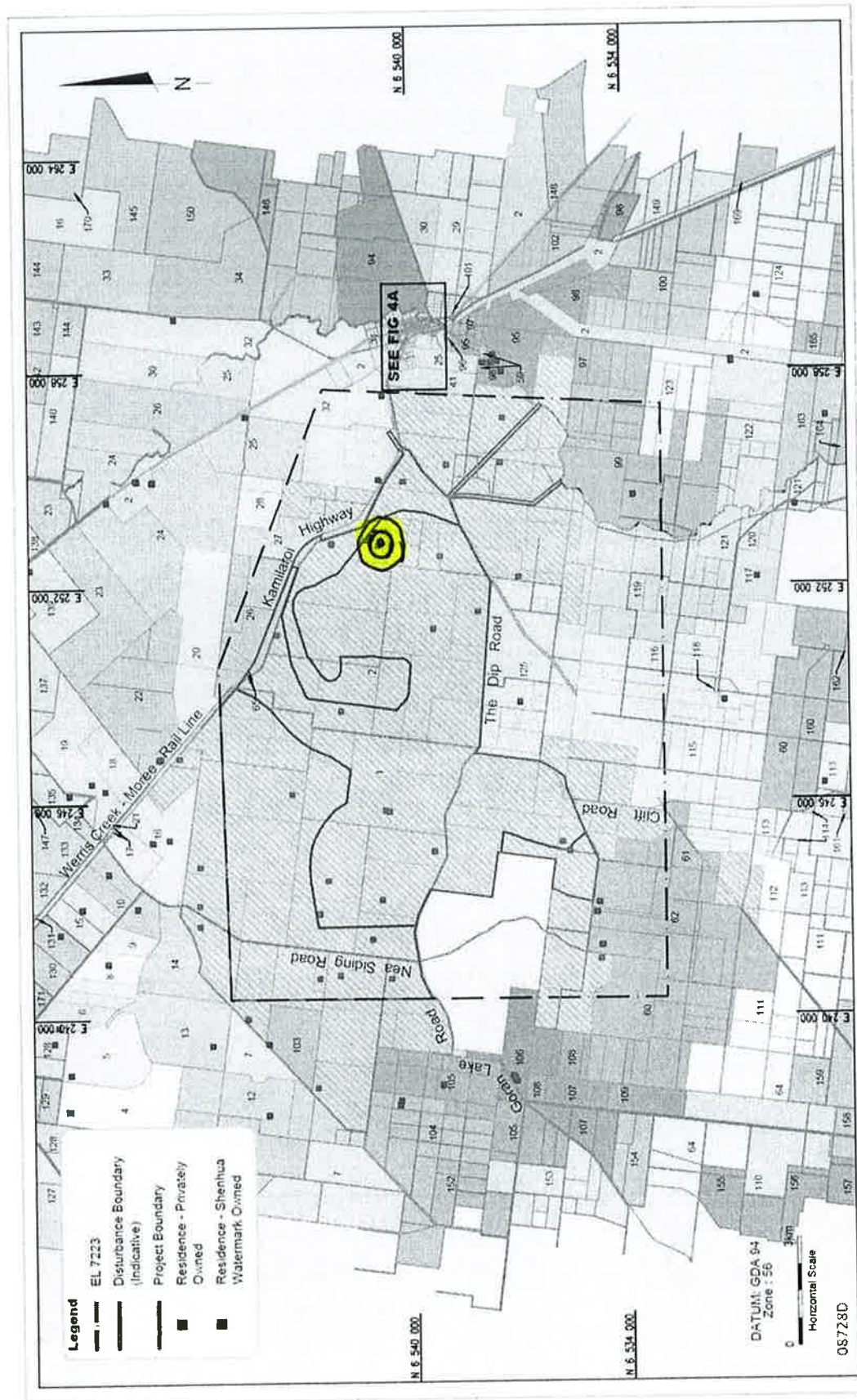


Figure 3.2: Location of private and Shenhua Watermark owned receivers in the vicinity of the Project

"LOCATION OF BROWNS CORNER HOUSE IN WHICH WE LIVED FOR APPROXIMATELY 15 YEARS"

Rose of Wind direction versus Wind speed in km/h (01 Feb 1877 to 30 Sep 2010)

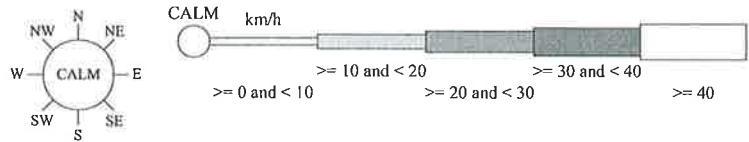
Custom times selected, refer to attached note for details

GUNNEDAH POOL

Site No: 055023 • Opened Jan 1876 • Still Open • Latitude: -30.9841° • Longitude: 150.254° • Elevation 285m

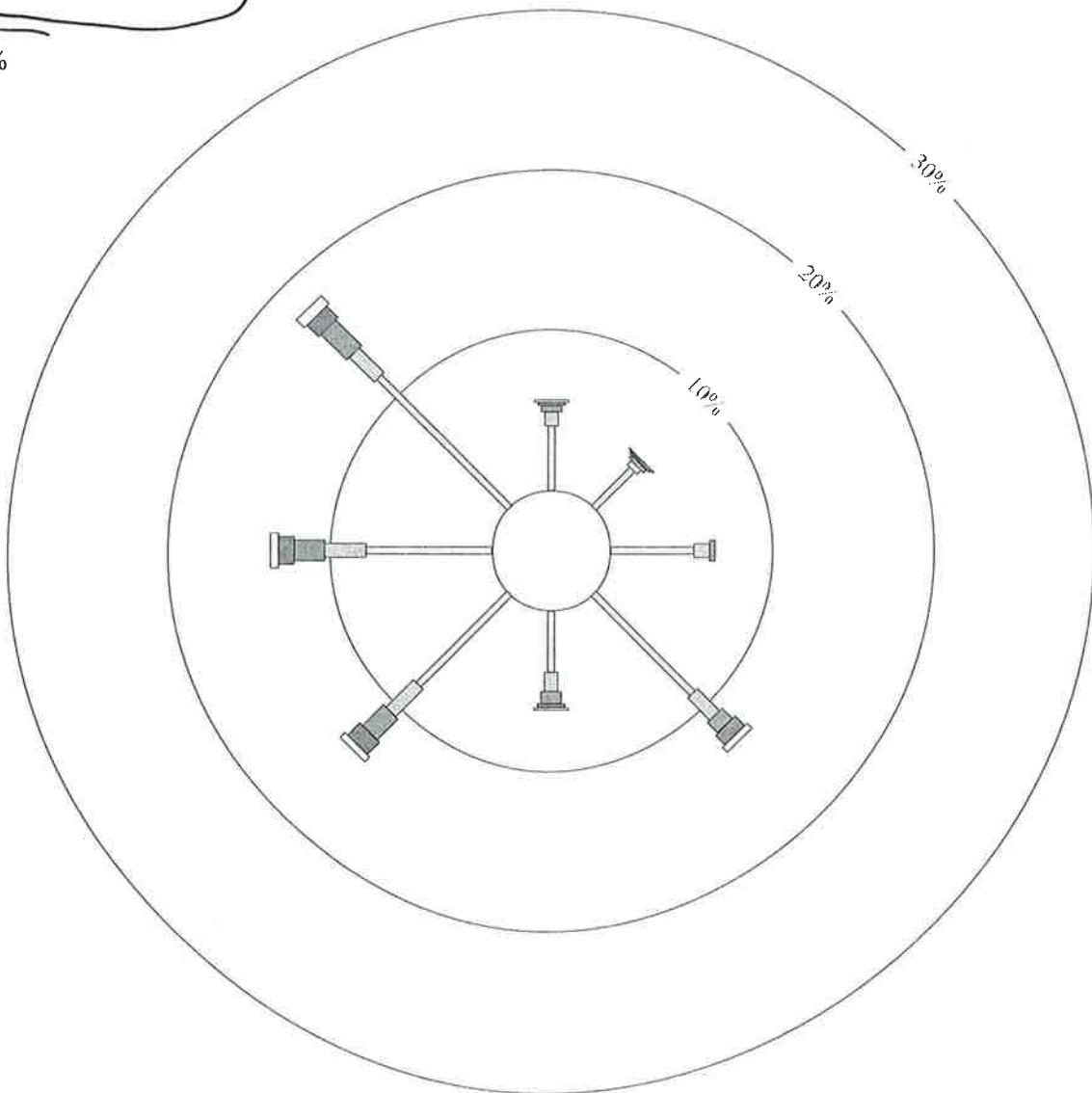
An asterisk (*) indicates that calm is less than 0.5%.

Other important info about this analysis is available in the accompanying notes.



3 pm Jul
1421 Total Observations

Calm 19%



GUNNEDAH POOL 3PM WIND OBSERVATIONS
1877 TO 2010 JULY

NORTH WEST IS MOST DOMINANT
SOUTH WEST IS 2ND MOST DOMINANT

Rose of Wind direction versus Wind speed in km/h (01 Feb 1877 to 30 Sep 2010)

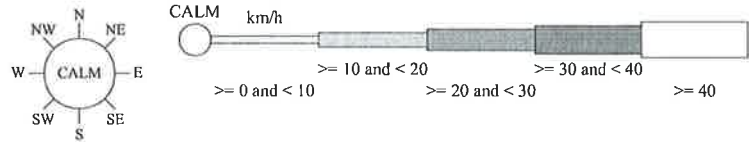
Custom times selected, refer to attached note for details

GUNNEDAH POOL

Site No: 055023 • Opened Jan 1876 • Still Open • Latitude: -30.9841° • Longitude: 150.254° • Elevation 285m

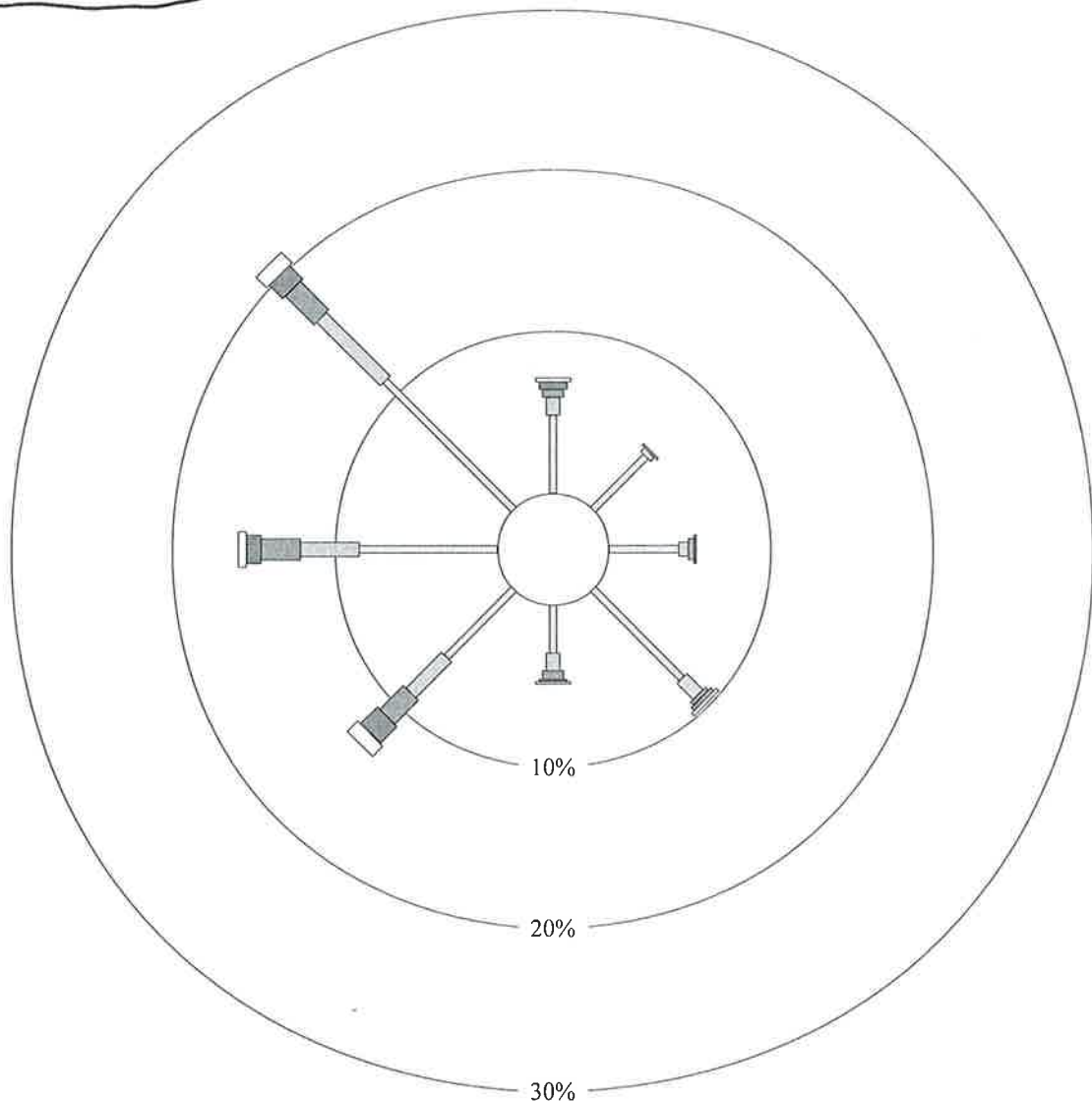
An asterisk (*) indicates that calm is less than 0.5%.

Other important info about this analysis is available in the accompanying notes.



3 pm Aug
1465 Total Observations

Calm 17%



GUNNEDAH POOL 3PM WIND OBSERVATIONS
1877 TO 2010 AUGUST
NORTH WEST IS MOST DOMINANT
WEST IS 2ND MOST DOMINANT

Rose of Wind direction versus Wind speed in km/h (01 Feb 1877 to 30 Sep 2010)

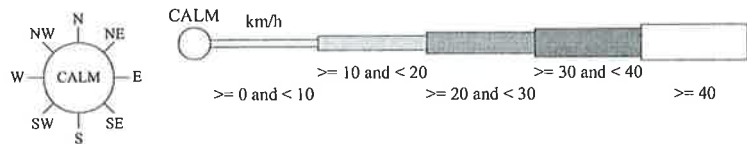
Custom times selected, refer to attached note for details

GUNNEDAH POOL

Site No: 055023 • Opened Jan 1876 • Still Open • Latitude: -30.9841° • Longitude: 150.254° • Elevation 285m

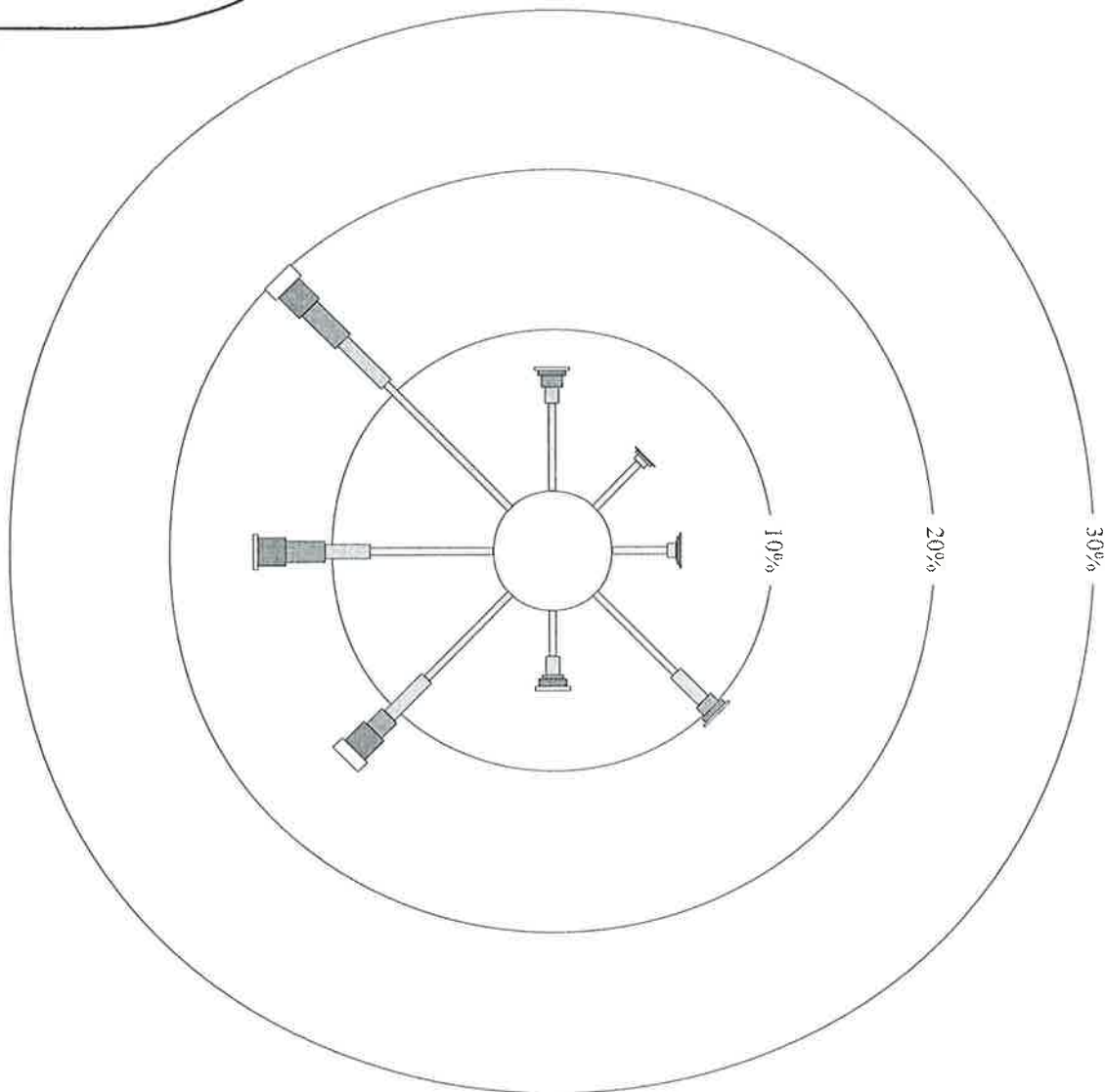
An asterisk (*) indicates that calm is less than 0.5%.

Other important info about this analysis is available in the accompanying notes.



3 pm Sep
1418 Total Observations

Calm 18%



GUNNEDAH POOL 3PM WIND OBSERVATIONS
1877 TO 2010 SEPTEMBER
NORTH WEST MOST DOMINANT
SOUTH WEST 2ND MOST DOMINANT

Rose of Wind direction versus Wind speed in km/h (01 Feb 1877 to 30 Sep 2010)

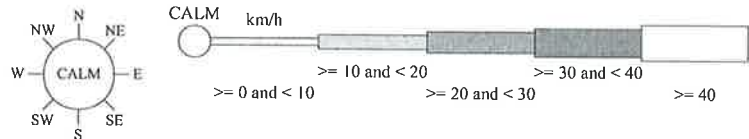
Custom times selected, refer to attached note for details

GUNNEDAH POOL

Site No: 055023 • Opened Jan 1876 • Still Open • Latitude: -30.9841° • Longitude: 150.254° • Elevation 285m

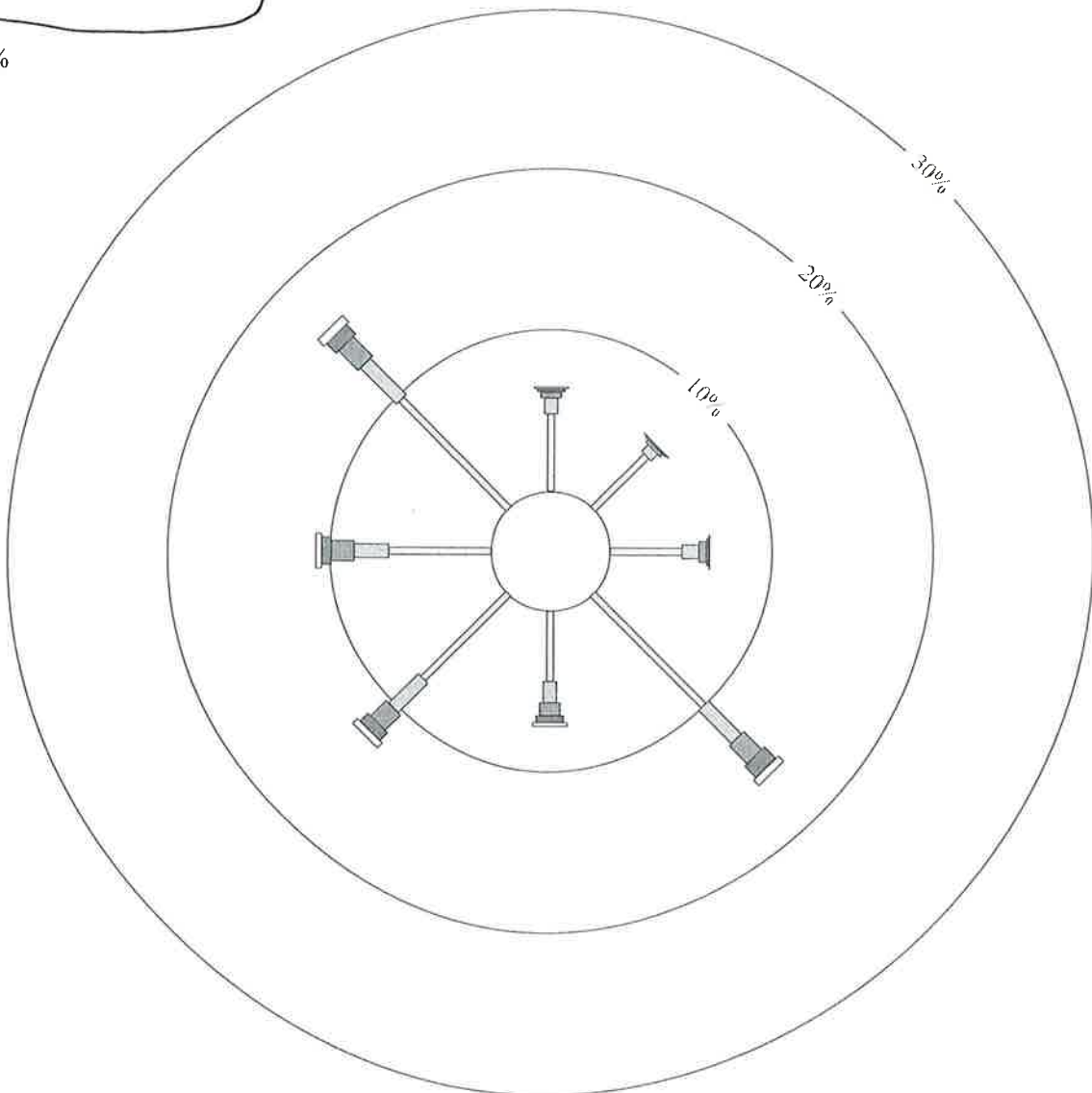
An asterisk (*) indicates that calm is less than 0.5%.

Other important info about this analysis is available in the accompanying notes.



3 pm
17299 Total Observations

Calm 19%



GUNNEDAH POOL 3PM WIND OBSERVATIONS
1877 TO 2010 WHOLE OF YEAR
NORTH WEST AND SOUTH ~~WEST~~^{EAST} ALMOST
EQUAL AS DOMINANT
SOUTH WEST 2ND MOST DOMINANT

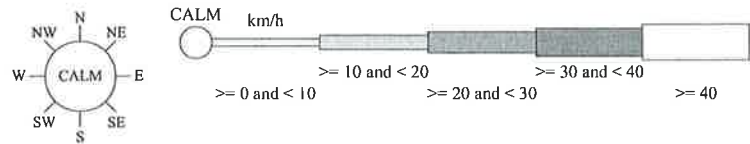
Rose of Wind direction versus Wind speed in km/h (07 Feb 1992 to 30 Sep 2010)

Custom times selected, refer to attached note for details

TAMWORTH AIRPORT AWS

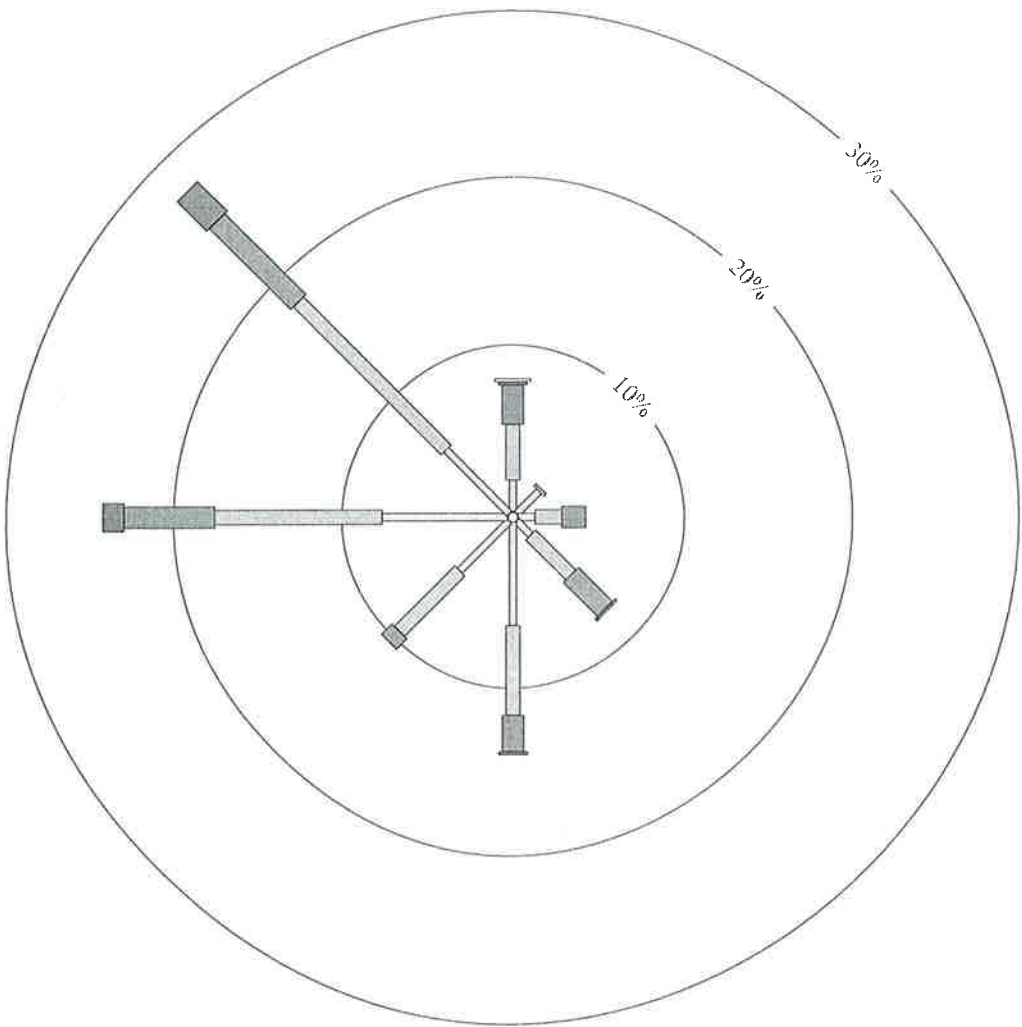
Site No: 055325 • Opened Jan 1992 • Still Open • Latitude: -31.0742° • Longitude: 150.8362° • Elevation 394.m

An asterisk (*) indicates that calm is less than 0.5%.
Other important info about this analysis is available in the accompanying notes.



3 pm Jul
549 Total Observations

Calm 1%



TAMWORTH AIRPORT 3PM WIND OBSERVATIONS
FROM 1992 TO 2010 JULY.
NORTH WEST IS MOST DOMINANT
WEST IS 2ND MOST DOMINANT

Rose of Wind direction versus Wind speed in km/h (07 Feb 1992 to 30 Sep 2010)

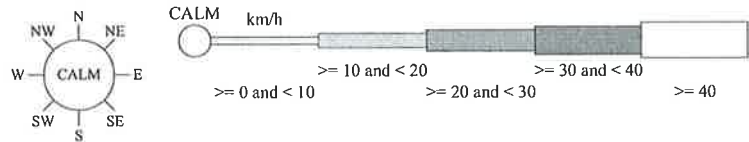
Custom times selected, refer to attached note for details

TAMWORTH AIRPORT AWS

Site No: 055325 • Opened Jan 1992 • Still Open • Latitude: -31.0742° • Longitude: 150.8362° • Elevation 394.m

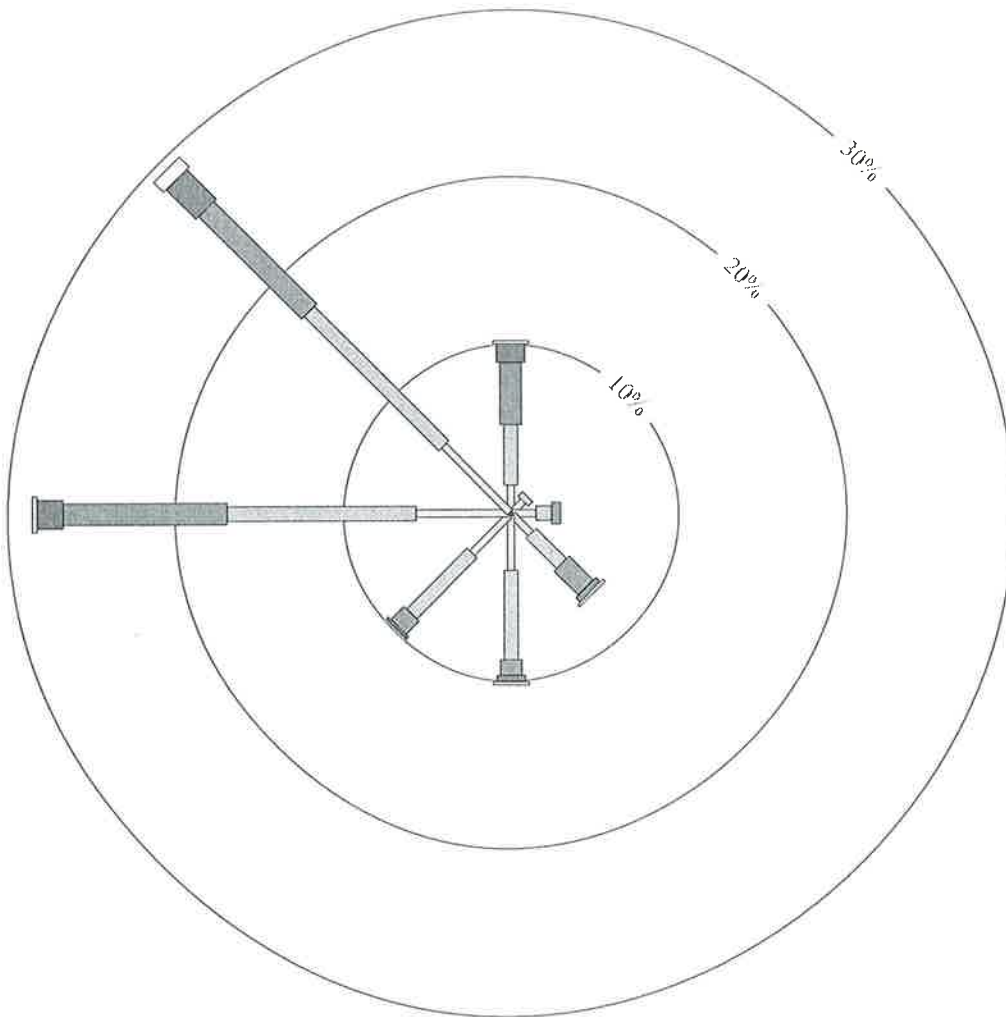
An asterisk (*) indicates that calm is less than 0.5%.

Other important info about this analysis is available in the accompanying notes.



3 pm Aug
535 Total Observations

Calm *



TAMWORTH AIRPORT 3PM WIND OBSERVATIONS
FROM 1992 TO 2010. AUGUST
WEST IS MOST DOMINANT
NORTH WEST IS 2ND MOST DOMINANT

Rose of Wind direction versus Wind speed in km/h (07 Feb 1992 to 30 Sep 2010)

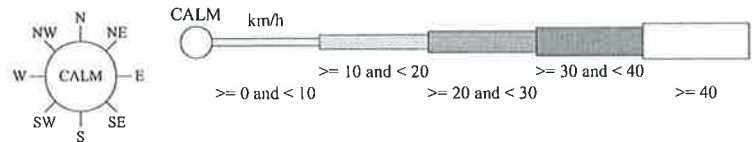
Custom times selected, refer to attached note for details

TAMWORTH AIRPORT AWS

Site No: 055325 • Opened Jan 1992 • Still Open • Latitude: -31.0742° • Longitude: 150.8362° • Elevation 394 m

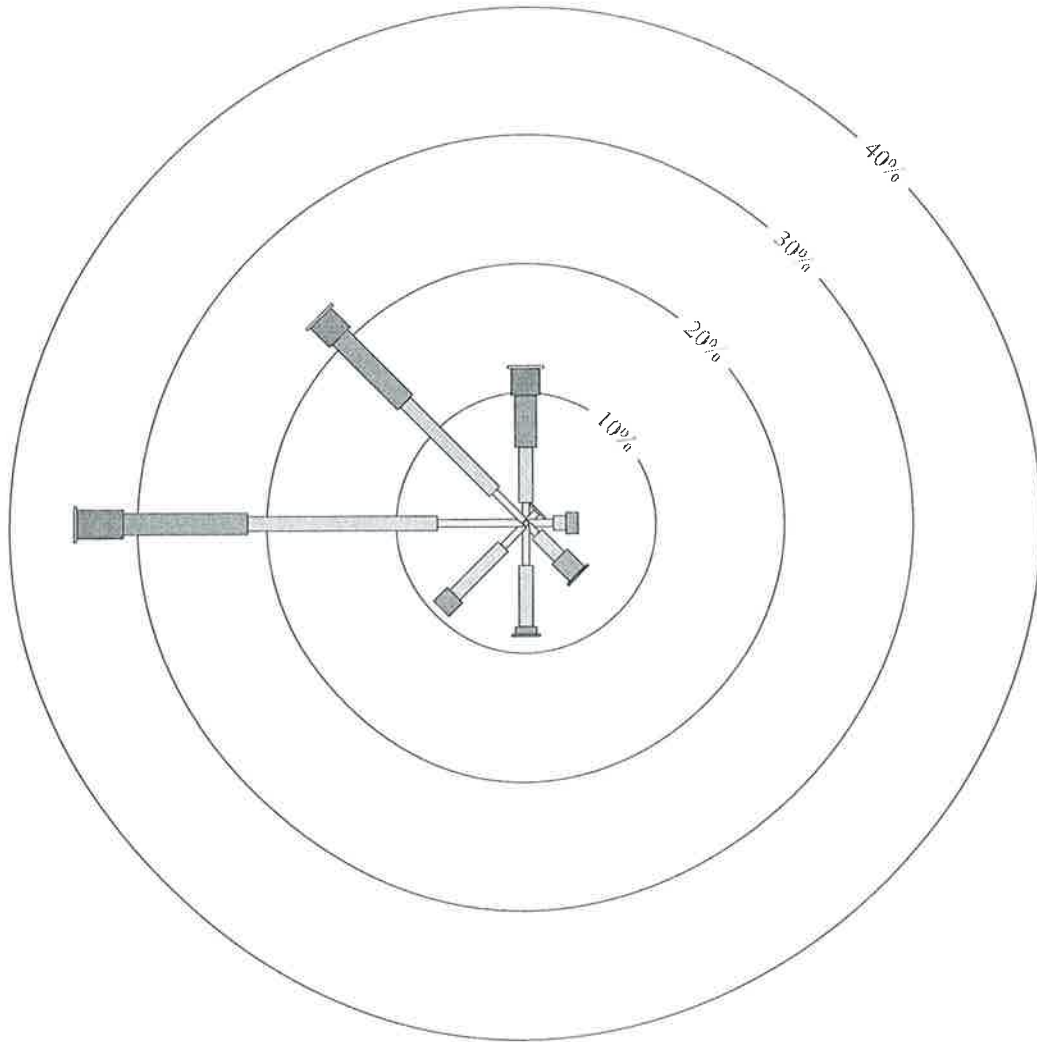
An asterisk (*) indicates that calm is less than 0.5%.

Other important info about this analysis is available in the accompanying notes.



3 pm Sep
516 Total Observations

Calm 1%



TAMWORTH AIRPORT 3PM WIND OBSERVATIONS
FROM 1992 TO 2010 SEPTEMBER
WEST IS MOST DOMINANT
NORTH WEST IS 2ND MOST DOMINANT



Rose of Wind direction versus Wind speed in km/h (07 Feb 1992 to 30 Sep 2010)

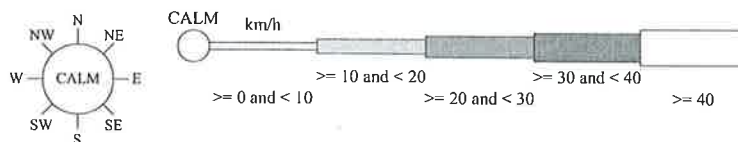
Custom times selected, refer to attached note for details

TAMWORTH AIRPORT AWS

Site No: 055325 • Opened Jan 1992 • Still Open • Latitude: -31.0742° • Longitude: 150.8362° • Elevation 394.m

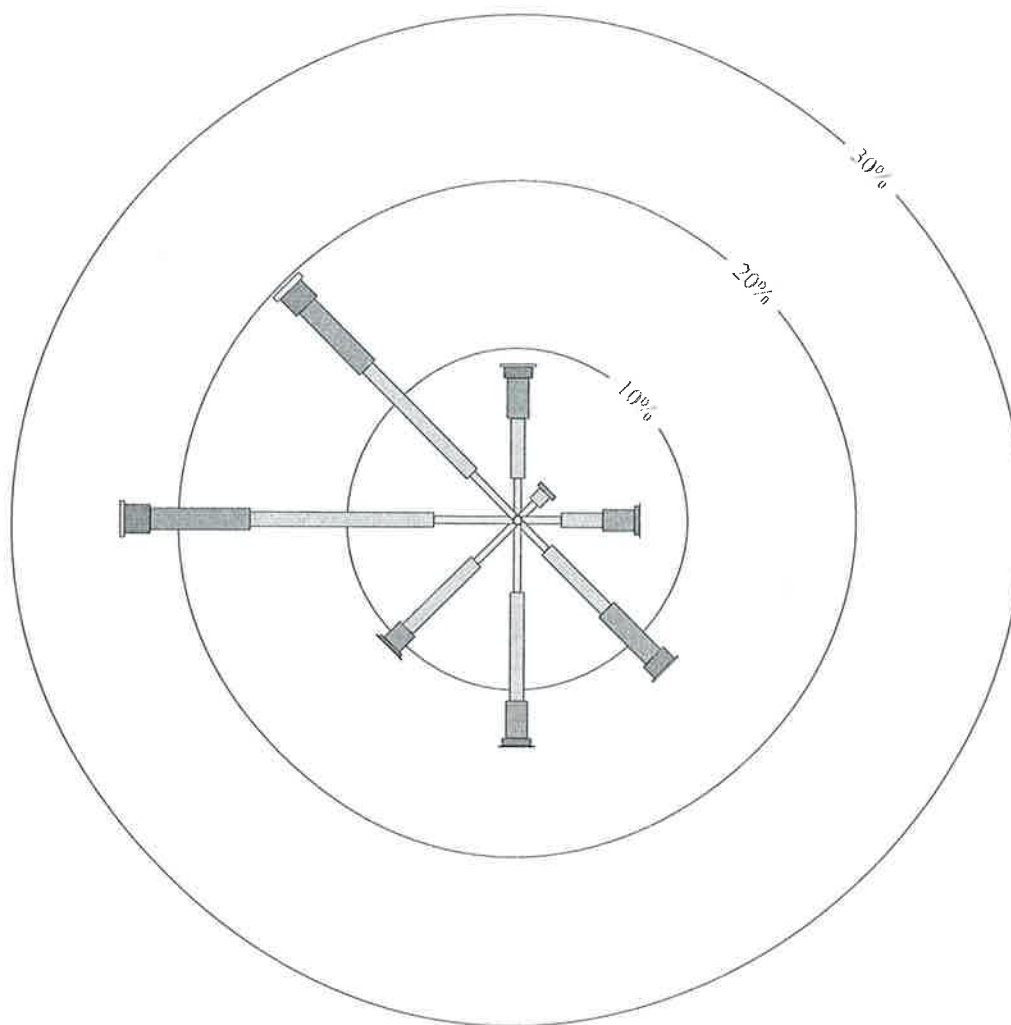
An asterisk (*) indicates that calm is less than 0.5%.

Other important info about this analysis is available in the accompanying notes.



3 pm
6185 Total Observations

Calm 1%



TAMWORTH AIRPORT 3PM WIND OBSERVATIONS
FROM 7 FEBRUARY 1992 TO 30 SEPTEMBER 2010
TOTAL OF 6,185 OBSERVATIONS. WHOLE OF YEAR.
WEST IS MOST DOMINANT
NORTH WEST IS 2ND MOST DOMINANT

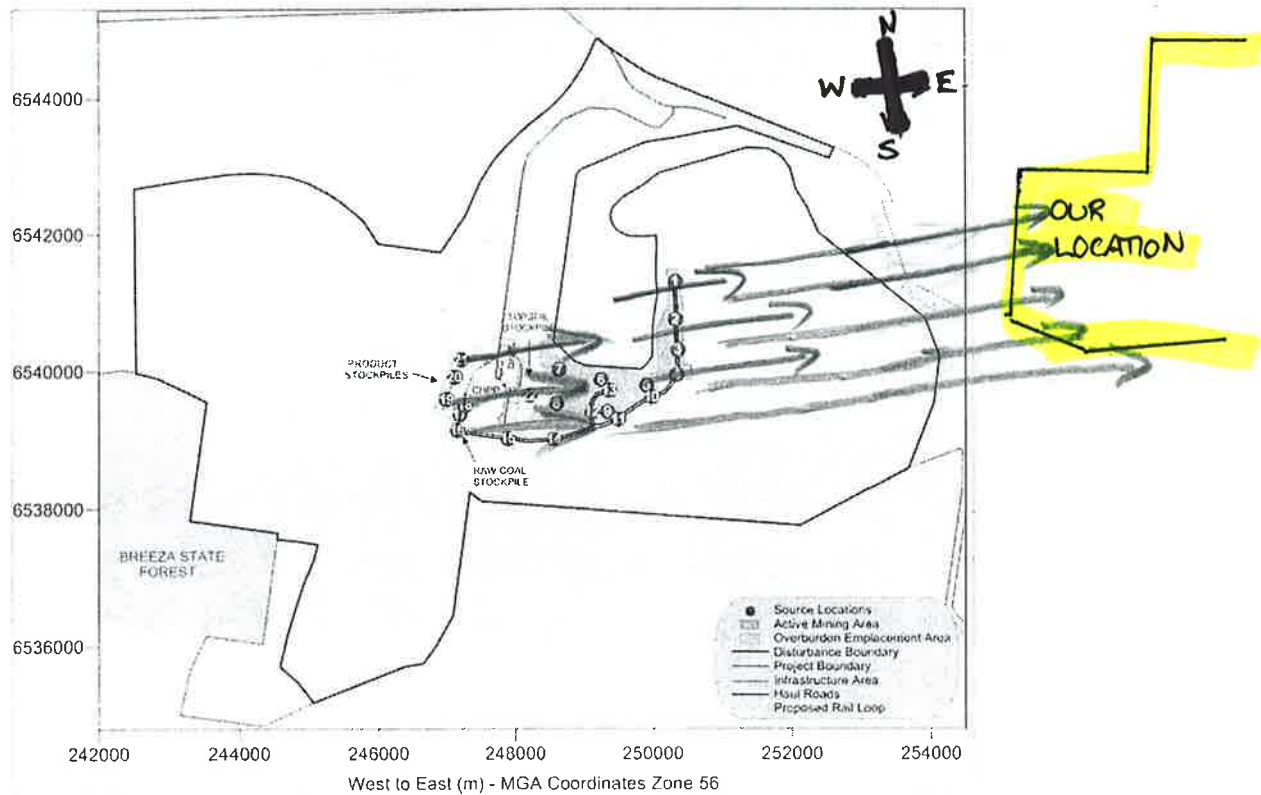


Figure 8.1: Location of Sources for Year 1

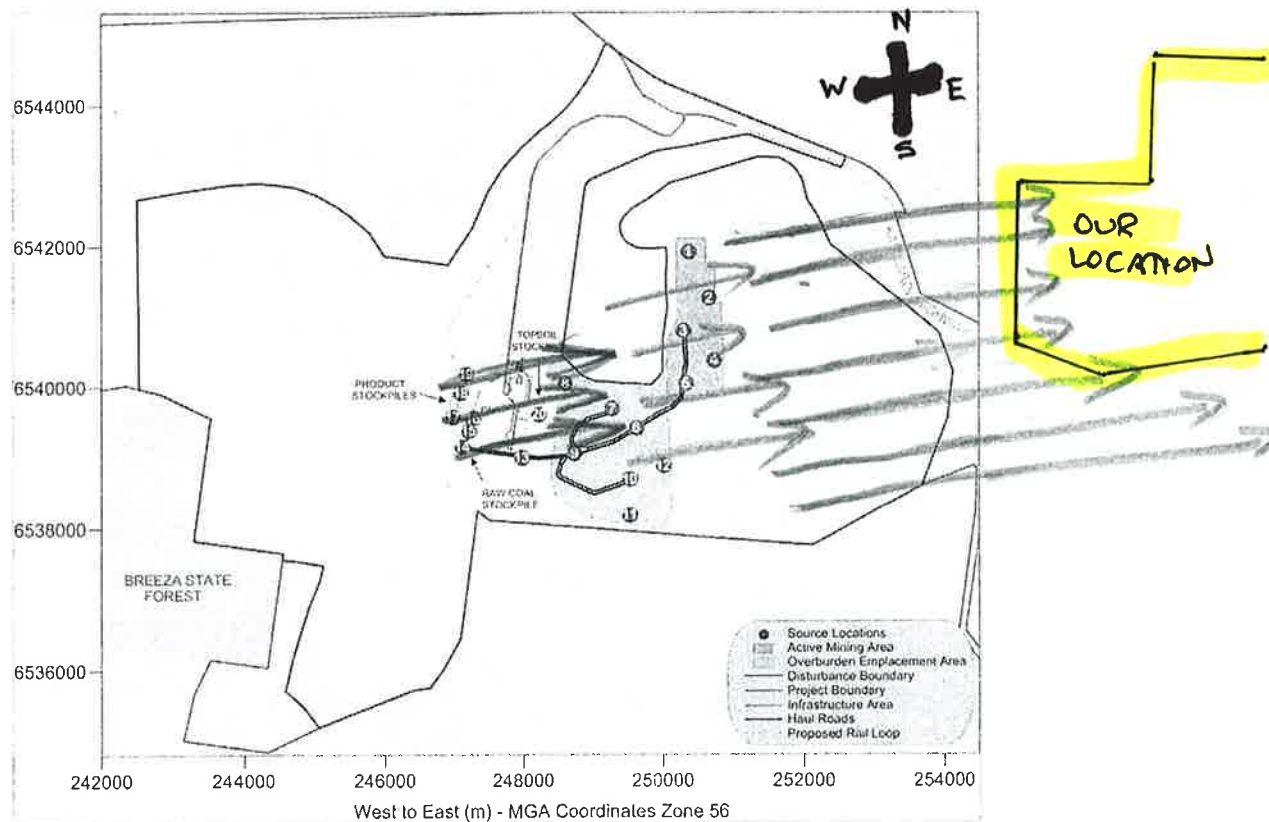


Figure 8.2: Location of Sources for Year 2

" POTENTIAL PARTICULATE FLOWS DIRECTION YEARS 1 AND 2, BASED ON LOWER WIND DATA THAN IS ACCURATE "

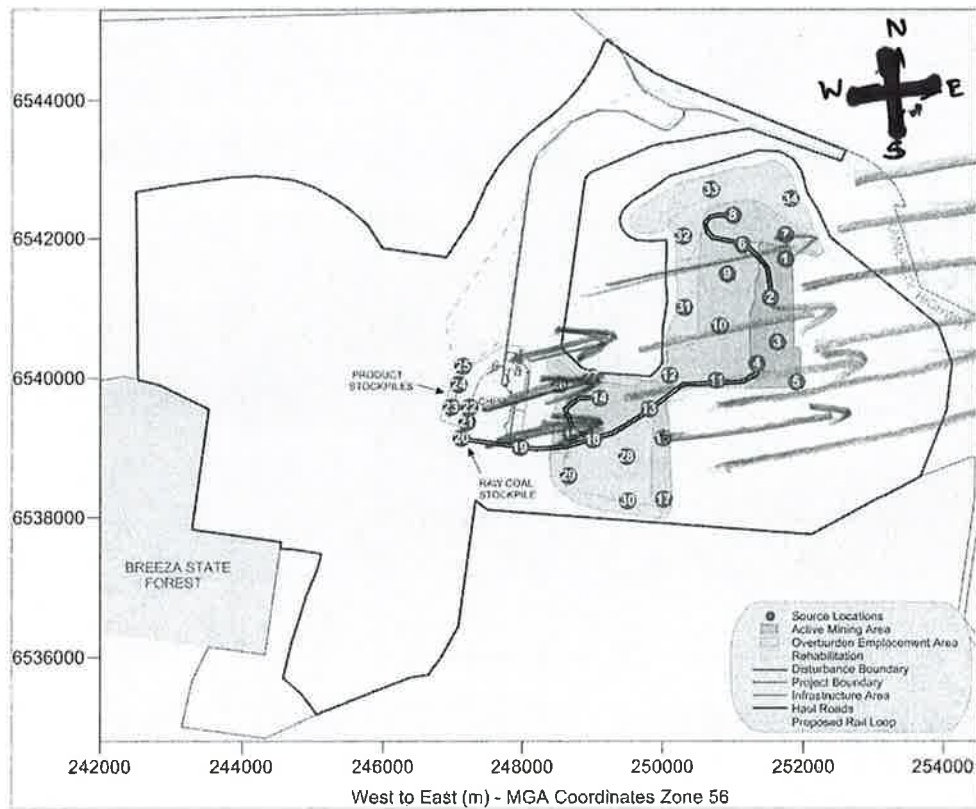


Figure 8.3: Location of Sources for Year 5

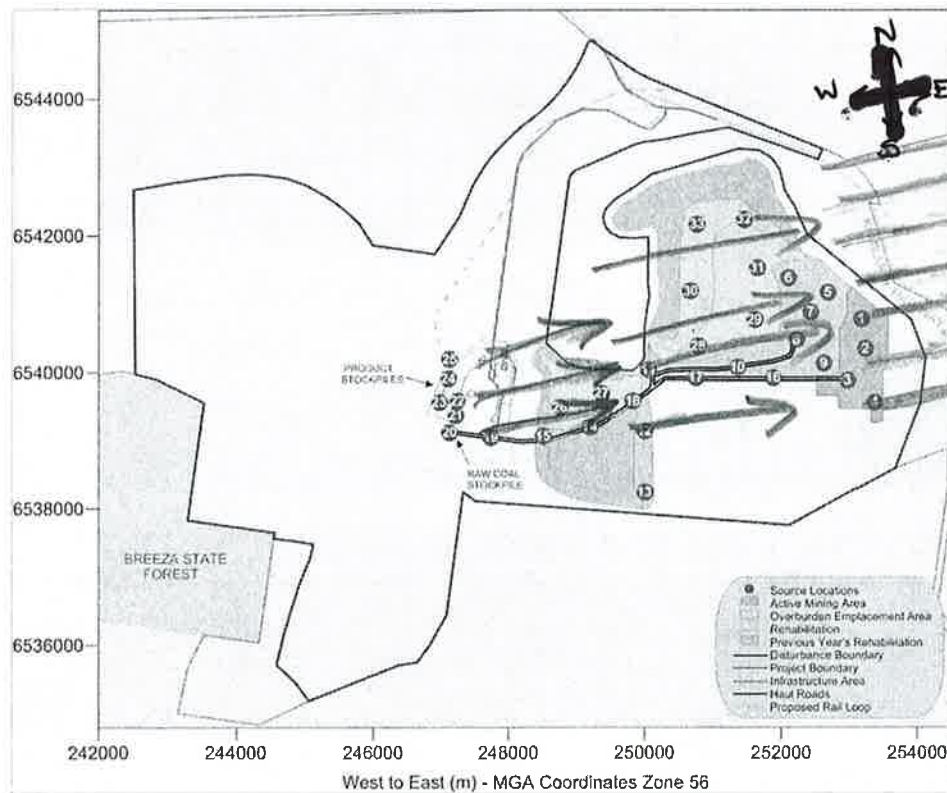


Figure 8.4: Location of Sources for Year 10

"POTENTIAL PARTICULATE FLOWS DIRECTION
YEARS 5 AND 10 BASED ON LOWER
WIND DATA THAN IS ACCURATE"

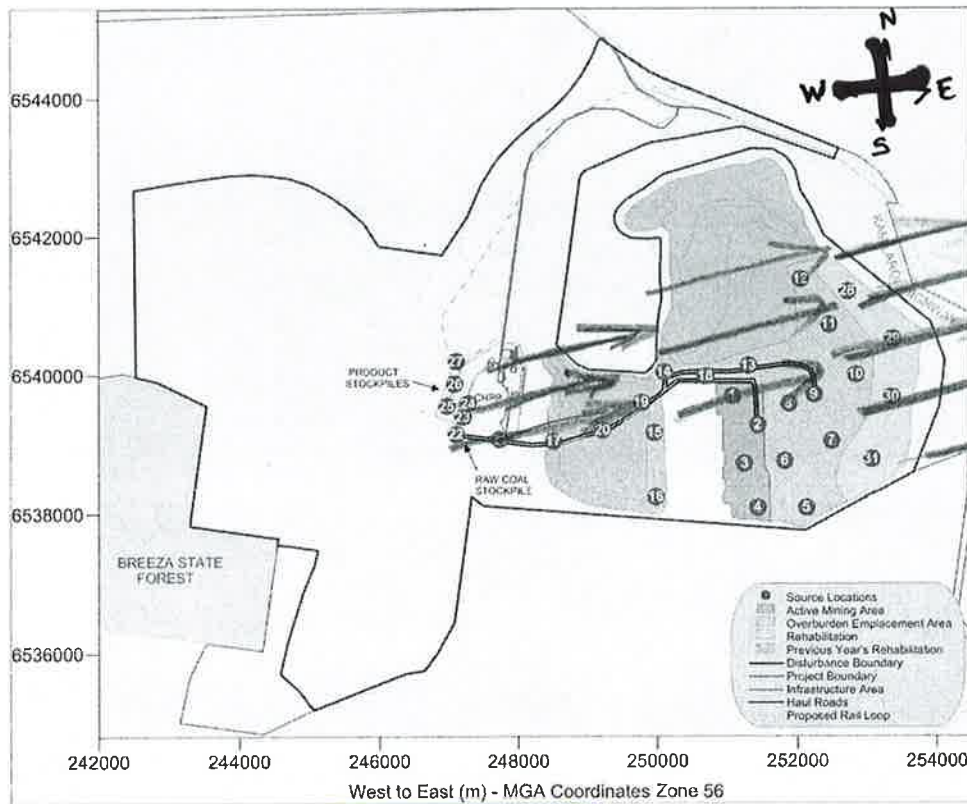


Figure 8.5: Location of Sources for Year 15

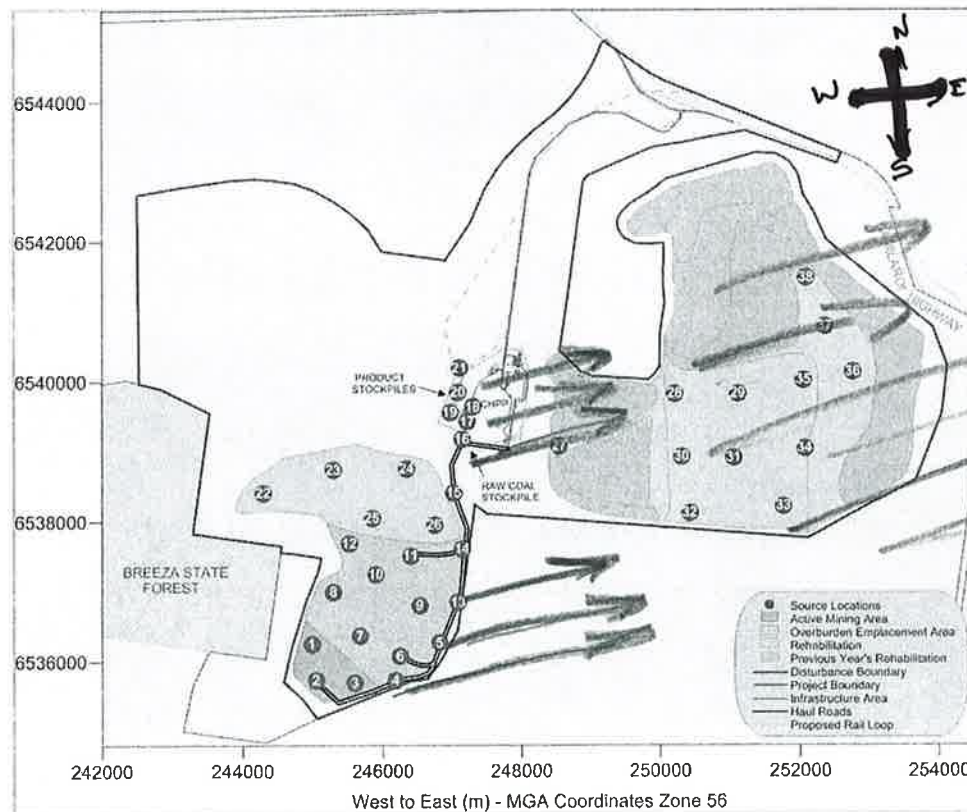


Figure 8.6: Location of Sources for Year 21

"POTENTIAL PARTICULATE FLOWS DIRECTION YEARS 15 AND 21 BASED ON LOWER WIND DATA THAN IS ACCURATE"

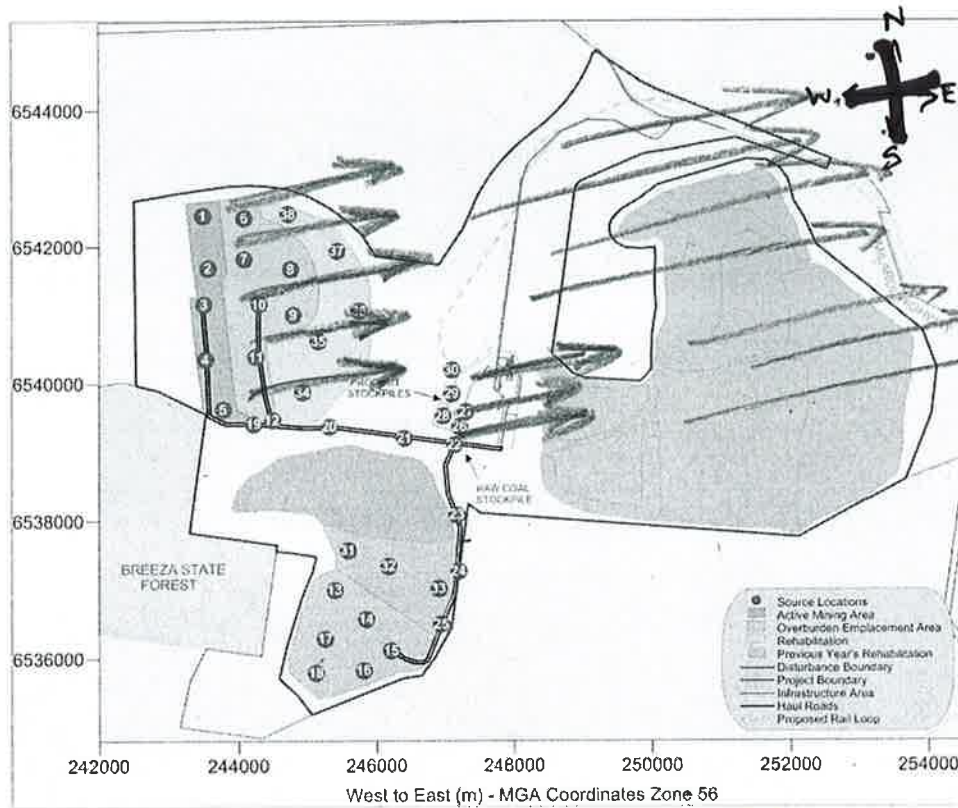


Figure 8.7: Location of Sources for Year 25

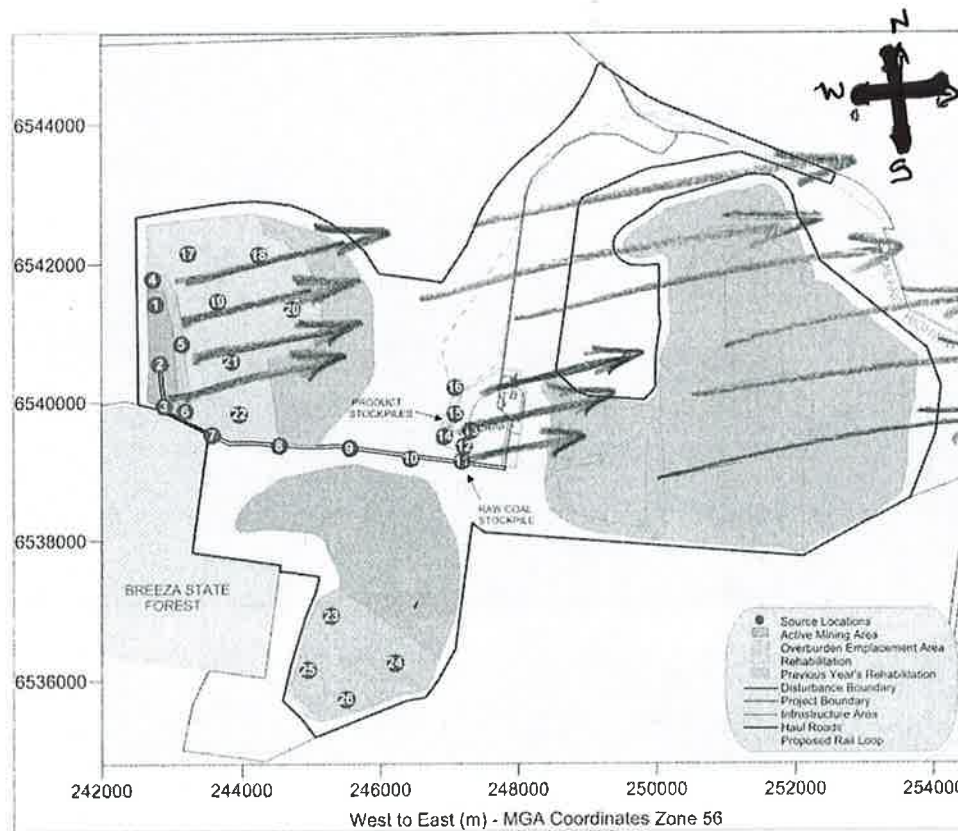


Figure 8.8: Location of Sources for Year 30

"POTENTIAL PARTICULATE FLOWS DIRECTION
YEARS 25 AND 30 BASED ON LOWER
WIND DATA THAN IS ACCURATE"

Certificate of Compliance

Attachment "I"

CERTIFIED OPERATION

JF Warmoll & Co.

Merrigal, 5538 Kamilaroi Highway, Breeza NSW 2381 Australia

CERTIFIED LOGO



SCOPE OF CERTIFICATION

FACILITIES

592 Hectares of 2597.3 Hectares of the property
(comprising area 592ha, Lot number(s) 177 of DP755477, 178 of DP75577,
Parish Breeza, County Pottinger, Shire Gunnedah) located at
Merrigal, 5538 Kamilaroi Highway, Breeza NSW 2381 in Australia

PRODUCTS

**BARLEY, BUCKWHEAT, CORN,
FIELD PEAS, SOY BEANS,
VETCH, WHEAT**

STANDARDS

Certified in accordance with the Australian Certified Organic Standard and in conformity with the Australian National Standard for Organic and Biodynamic Produce and in accordance with the ISO65 accreditation program as accredited by IOAS.

The above named operator is licensed to supply or direct the application of the BFA trademark provided the product has been produced in accordance with the Australian Certified Organic Standard 2010 by the operator or under the operator's supervision at the listed location. This certificate is not a commercial document and may not be used as such. This certificate remains the property of Australian Certified Organic Pty Ltd and remains valid until the expiry date or until surrendered, suspended or revoked.

Valid Until 31 May 2013

Authorised by:
Michael Baker
Chief Certification Officer

Place & Date of Issue:
Brisbane, Australia
12 November 2012



Australian Certified Organic Pty Ltd

ABN 74 099 884 983

PO Box 530 766 Gympie Rd CHERMSIDE QLD 4032
Ph: +61 (0)7 3350 5706 Fax: +61 (0)7 3350 5996

Certificate of Compliance

ATTACHMENT "J"

CERTIFIED OPERATION

Breeza Seeds

Merrigal, 5538 Kamilaroi Highway, Breeza NSW 2381 Australia

CERTIFIED LOGO



SCOPE OF CERTIFICATION

FACILITIES

Located at 5538 Kamilaroi Highway, Breeza NSW 2381 in Australia

PRODUCTS

**GRADING AND STORAGE OF SOYBEANS, CEREALS AND PULSES,
GRAIN PROCESSING**

STANDARDS

Certified in accordance with the Australian Certified Organic Standard and in conformity with the Australian National Standard for Organic and Biodynamic Produce and in accordance with the ISO65 accreditation program as accredited by IOAS.

The above named operator is licensed to supply or direct the application of the BFA trademark provided the product has been produced in accordance with the Australian Certified Organic Standard 2010 by the operator or under the operator's supervision at the listed location. This certificate is not a commercial document and may not be used as such. This certificate remains the property of Australian Certified Organic Pty Ltd and remains valid until the expiry date or until surrendered, suspended or revoked.

Valid Until 31 May 2013

A handwritten signature in black ink, appearing to read "Michael Baker".

Authorised by:
Michael Baker
Chief Certification Officer

Place & Date of Issue:
Brisbane, Australia
7 November 2012



Australian Certified Organic Pty Ltd

ABN 74 099 884 983

PO Box 530 766 Gympie Rd CHERMSIDE QLD 4032
Ph: +61 (0)7 3350 5706 Fax: +61 (0)7 3350 5996



VITASOY AUSTRALIA PRODUCTS PTY LTD

(A Vitasoy International Holdings Ltd & National Foods Joint Venture)

April 19th 2013

Mr Phillip Warmoll
Breeza Seeds
5538 Kamilaroi Highway
Breeza NSW 2381

Dear Phillip,

I am writing regarding the potential impacts of coal mining in your area.

You have been a valued supplier to Vitasoy Australia Products since we commenced manufacturing in Australia with sales to us last year of 900MT of organic soybeans making you one of our largest suppliers. In addition you have been adding value to your soybean production through your cleaning and grading facility which has been processing soybeans for us from both yourself and other farmers in the region.

Whilst we are not in a position to comment specifically on the potential for contamination by mining dust it is important to note that our contracts include a requirement that soybeans sold to us meet the requirements of the Australian Organic Foundation (for organic status) and the Australian Food Standards Code. Anything that compromises the organic or quality status of the soybeans you supply us will result in us being unable to use those soybeans and the cancellation of either/both supply and processing contracts with the associated financial implications.

It would be very disappointing, after such a long standing relationship, if you were no longer able to supply us soybeans due to being unable to meet our quality requirements however as you know the soybeans you provide are processed in Australia into high quality premium soymilk which is sold throughout Australia/NZ and we have a clear responsibility to our consumers and regulators to ensure our product meets our claims and the relevant food standards.

If you have any questions regarding any of the above please don't hesitate to contact me.

Yours Sincerely

Anthony Ainsworth
Supply Manager
Vitasoy Australia Products



Mara Global Foods Pty Ltd

ABN 41 138 098 923

T – (02) 6664 5287

F – (02) 6664 5129

20 April 2013

Phillip Warmoll
5538 Kamilaroi Highway
Breeza NSW 2381

Dear Phillip,

We are concerned that the Shenhua Watermark coal mine is to be developed a short distance from your farm and grading plant.

We enjoy the business relationship built between us, and have come to rely on the quality of the product you provide.

Given our Certified Organic Status and the strict quality requirements of our customers we need to confirm to you that any contamination events would result in the contaminated product being returned.

Any costs associated with products being returned due to dust or pollutant contamination would need to be borne by you.

A single event of contaminated product could jeopardise the reputation we have worked so hard to build over years of doing business.

We wish you all the best, and hope that appropriate safeguards are put in place by the mining company to minimise risk to you and the many other farmers in your area.

Yours sincerely

A handwritten signature in dark ink, appearing to read "Ross Larsson".

Ross Larsson
General Manager



Wholegrain Milling Company Pty Ltd
17/21 Borthwick Road, Gunnedah NSW 2380
post: PO Box 347, Gunnedah NSW 2380
tel: + 61 2 6742 3939 | fax: + 61 2 6742 8615
email: admin@wholegrain.com.au | web: www.wholegrain.com.au

To whom it may concern,

We have been purchasing Certified Organic grains from Breeza seeds for 10 years and have had no problems with there product meeting Organic Certified status (which is essential for us to process and resell)
The construction of a coal facility that has the potential to emit large amounts of dust will render product from Breeza seeds unusable as a Certified Organic product in the future

A handwritten signature in black ink, appearing to read "Craig Neale", written over a horizontal line.

Craig Neale
Manager
Wholegrain Milling Company Pty Ltd

100% certified
organic flour millers

Hakubaku Agri Pty Ltd
12 Rangers Retreat Road
Frenchs Forest New South Wales, 2086
AUSTRALIA

ABN 85 137 194 766

22 March 2013

Mr. Phillip Warmoll
JF Warmoll & Co
Breeza Seeds Pty Ltd
5538 Kamilaroi Highway
Breeza, New South Wales
Australia, 2381

Dear Phillip,

Thank you for forwarding to us a copy of the Environmental Impact Statement relating to the Watermark Shenhua coal mine development near your property.

We wish to express our concern as to the potential contamination risk to product being grown, graded and packed for us by JF Warmoll and Breeza Seeds Pty Ltd.

In accordance with our normal regulations and specifications on food products imported into Japan – any product found to be contaminated by dust or other particulate would certainly be rejected. This applies to all products listed below that you currently supply us with:

- Buckwheat which is used in soba noodle production.
- Mung beans for our popular snack product which sold on the Bullet Train.
- Polished white sorghum for cooking with rice.

Note that any rejected shipment or part thereof would incur all costs charged by Japanese Quarantine for their additional analysis requirements creating a large expense to you as the shipper and our firm as the importer. Any forced return of rejected product to Australia would be at your cost.

We need to consider these facts in future contracts and trades.

Yours sincerely



Koji Maeda
Director



Australian Government

Australian Quarantine and Inspection Service

AUDIT REPORT LEAD SHEET

Audit Report No.	2012ERE-1	Date(s) of Audit	20/03/12	File No.	N/A
Type Of Audit	Announced	Previous Audit Date(s)		Previous Audit Ref.	Initial
Company	Breeza Seeds Pty Ltd (ERE No: TBA)				
Site Address	Postal Address				
5538 Kamilaroi Highway Breeza NSW 2381	5538 Kamilaroi Highway Breeza NSW 2381				
Telephone No.	02 6744 5868 / 0429 445 868	Fax No.	02 6744 5868		
Company Contact	Phillip Warmoll				
Schedule(s)	Export Registered Establishment Initial Audit				
Major Non-conformity CAR No.	NIL				
Minor Non-conformity CAR No.	NIL				
Audited					
Breeza Seeds Pty Ltd export registered establishment was audited for annual export registration review.					
Overview Statement (clearly define scope, provide general statement describing audit i.e. follow up audit to close out CAR, auditing of theory for ERE registration and hygiene audit only, etc.)					
<p>This was a initial systems audit of the facility for registration to export prescribed goods including mung beans. The audit covered hygiene procedures and records related, waste disposal and records related, pest management and records related, condition of all storage areas, receival areas, inspection areas and loading areas to establish if the site meets the requirements to become a registered Export Registered Establishment.</p>					

Compliance (explain how compliance was demonstrated i.e. particular records checked, persons interviewed against check-sheets, define practical inspections carried out, etc)

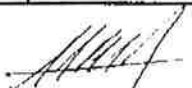
Administration: Current registration details checked against EX26 to ensure all is correct, all in order, EX26 signed by DAFF auditor and forwarded to NSW regional office for compliance check. A copy of the company policies and procedures, clean down procedures, rodent pest and other pest control and communicable diseases policies were checked and a copy placed on file, all are satisfactory.

Hygiene: The hygiene & waste disposal records were checked from 01/01/2012 to current and found to be in order. All areas utilised for processing, equipment, storage, receival and inspection were found to be in a good condition and maintained to export requirement.

Pest Management: The pest management records were checked from 01/01/12 to current and all were in order, a copy of the bait station map was obtained and placed on file, a visual inspection of the bait stations was undertaken and all were in the correct position clean and baited, the rodent barriers were in place. No vermin or pests were sighted during the audit.

Establishment Layout: All areas were clearly defined for processed vs unprocessed and inspected vs uninspected product, a site layout and operational flow chart were obtained and placed on file.

This was a scheduled initial audit and the policies and procedures put in place by management are excellent and appear to be working, the site was found to be extremely good condition at the time of the audit, the policies and procedures currently in place by the establishment's management are working well and the site meets all legislative requirements for export registration for prescribed goods and mung beans. I recommend that this new registration application be approved.

Previous Audit Policy Level:		New Policy Level: (If CAR issued check audit & compliance policies to determine level)	
Audit Result: PASS / FAIL (please circle)	Continued	Increase	Reduce
Lead Auditor Mark McLean	Signature 		Suspended 26/04/2012



Postal Address: P.O. Box 317, Gunnedah. 2380 Australia

Middlebrook Air Operations Pty. Ltd.

Telephone: 02 6744 5209 Fax: 02 6744 5284

Director Mining & Industry Projects
Department of Mining & Infrastructure
GPO Box 39
Sydney NSW 2000

24th April, 2013

SUBMISSION

Environmental Impact Statement
PROJECT: Watermark Coal Project

We have operated an Aerial Spraying business on the Breeza Plains for the last forty years. Our business is based on our own private airstrip on the eastern edge of the Breeza Plains

Our services are totally wind dependant and we have to comply with requirements from-

1. **EPA-Environmental Protection Authority** –Licence No. A284
2. **Aerial Agricultural Association of Australia (AAAA)** of which we are a Spraysafe Accredited member-Certificate 23.
3. **Local Government** of which I was an original member of the committee that put together The Gunnedah Guidelines for Aerial application.

So when I studied the windroses supplied for the Air Quality and Greenhouse Impact Assessment for Watermark Coal Project(pages 27 &28), **I find I have to disagree.**

The annual and seasonal windroses for the Watermark (WSI) for January 2010 to October 2011 whilst they may well be a record for the past 12 to 18 months I find with our local experience that the **strong winds are more predominant from the northwest and southwest**

The wind rose from the Gunnedah site number 055023 is the observation that tells the true story. Example from Gunnedah pool site No. 055023 **(Feb 1877 to Sep 2010).**

Our company would agree that the wind direction at Breeza would show that westerly and southerly winds would be relevant to the Breeza Area which is not shown on your chart.

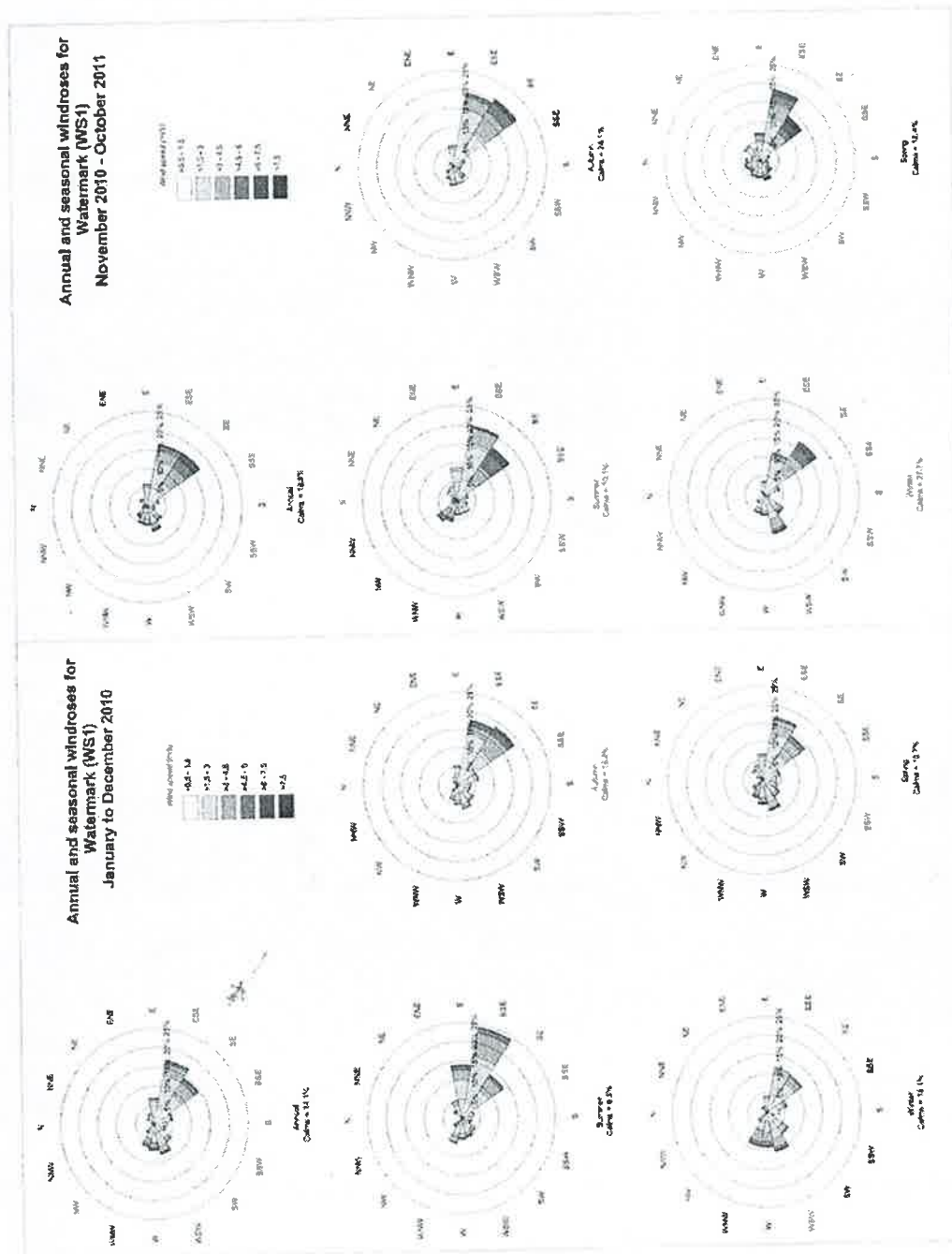
Tamworth direction and wind speed also show a similar trend only stronger westerly. Example from Tamworth Airport AWS site No. 155325 **(Feb 1992 to 30 Sep 2010).**

Therefore please accept this letter as stated above from our forty years of experience that westerly and southerly winds would be relevant to the Breeza Area.

I can be contacted on my mobile 0428 667440 for any further information.

Regards

Peter Middlebrook
Managing Director



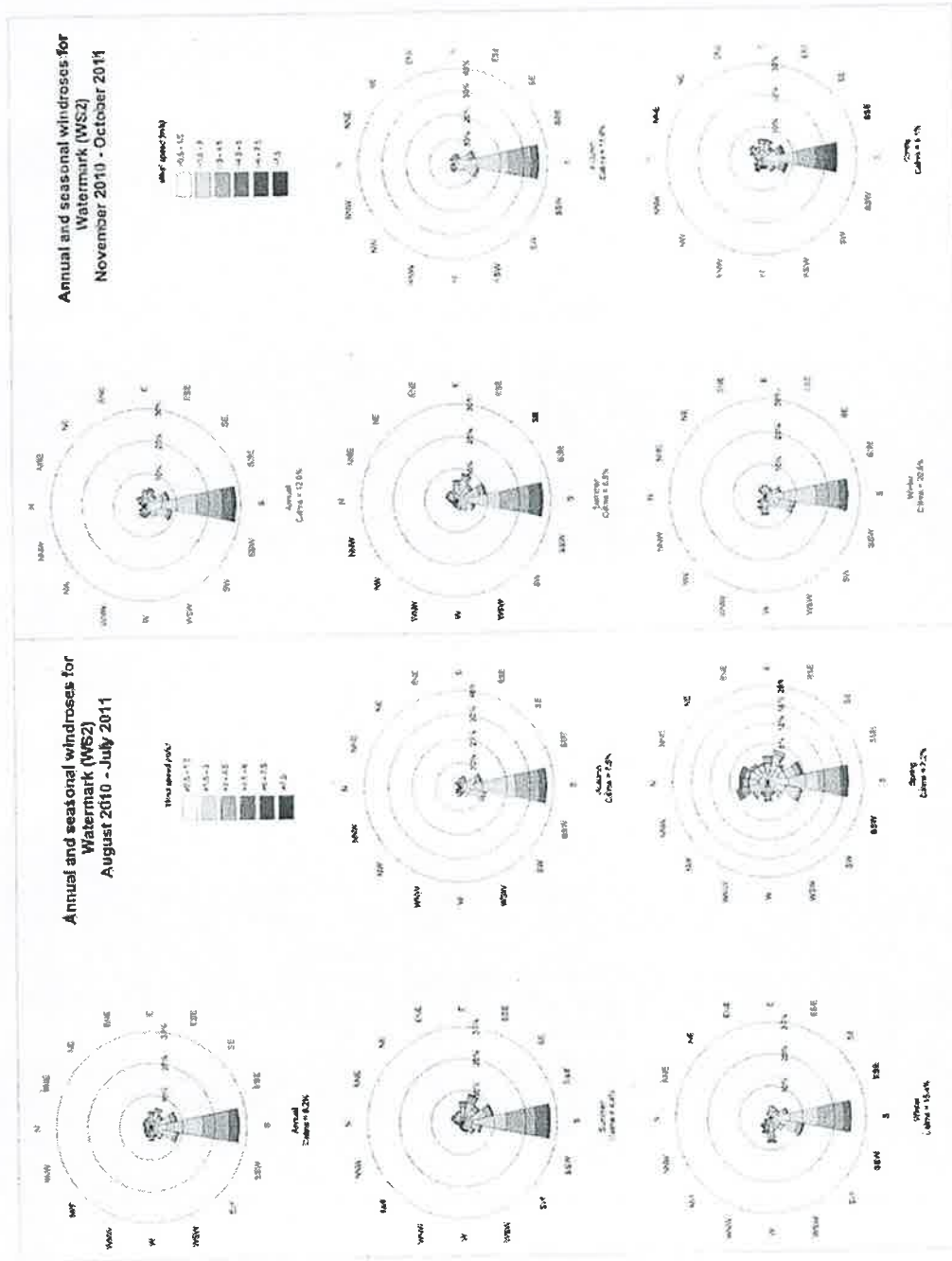


Figure 5.3: Annual and seasonal windroses for the WS2 meteorological station

Rose of Wind direction versus Wind speed in km/h (07 Feb 1992 to 30 Sep 2010)

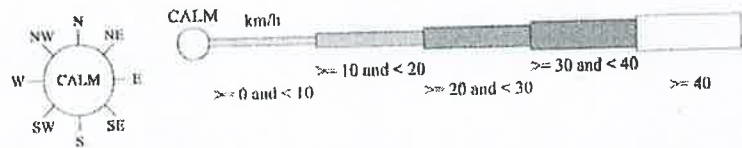
Custom times selected, refer to attached note for details

TAMWORTH AIRPORT AWS

Site No: 055325 • Opened Jan 1992 • Still Open • Latitude: -31.0742° • Longitude: 150.8362° • Elevation 394.m

An asterisk (*) indicates that calm is less than 0.5%.

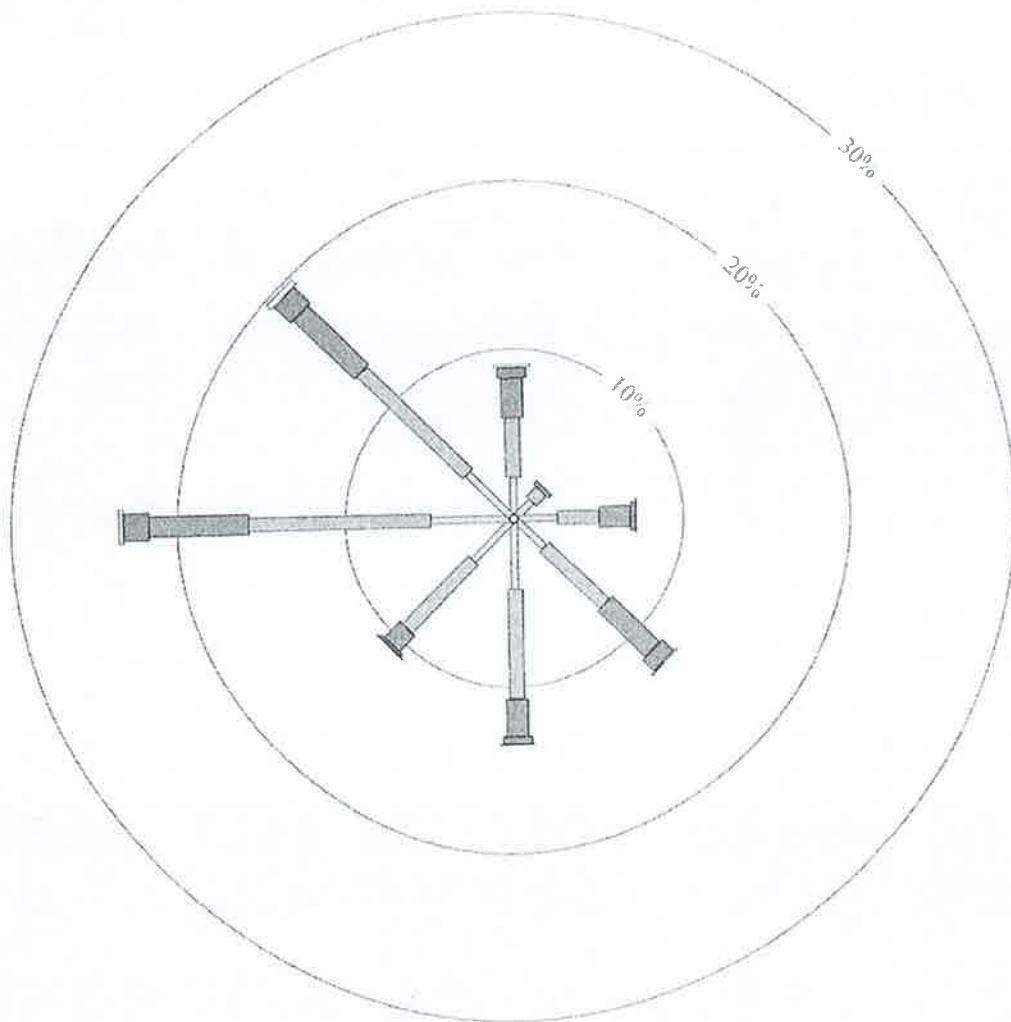
Other important info about this analysis is available in the accompanying notes.



3 pm

6185 Total Observations

Calm 1%





aco.net.au

ATTACHMENT "O"

Purely the Best.

Winner of the
CHOICE Award
for Best Food
Endorsement
Program 2010



24 April 2013

RE: PROPOSED MINING ACTIVITIES IN THE VICINITY OF CERTIFIED ORGANIC OPERATIONS JF WARMOLL & CO AND BREEZA SEEDLINGS, AND IMPLICATIONS OF CONTAMINATION OF PROPERTY

To Whom It May Concern:

The operations JF Warmoll & Co. and Breeza Seedlings are owned and operated by Philip, David and Elizabeth Warmoll, certified clients of Australian Certified Organic.

Concern has been expressed over consequences that would necessarily follow in the event of contamination of their organic property with substances prohibited by the *Australian Certified Organic Standard (ACOS)* 2010 and arising from the proposed mining operation in their vicinity.

Contamination of a certified organic property with substances not allowed by the ACOS will lead to decertification of the affected area. Time periods for re-certification depend on the nature and extent of the contamination, ranging between 12 months (in the event of unforeseen contamination out of the control of the certified operator, and combined with appropriate chemical residue testing – see ACOS 4.8.26.) and permanent decertification (in the event that contamination threats cannot be managed in such a way to avoid contamination of certified products or the farming system).

ACOS clause 4.8.24. states that *"in certain instances, ambient or environmental contamination may be such as to preclude operators and operations from certification, where it cannot be demonstrably shown that contamination threats are able to be managed in a way as to avoid contamination of certified products and the farming system. Rigorous and ongoing monitoring and residue testing may be required where such concerns exist"*.

If you require further information, please contact the ACO office on 07 3350 5706.

Yours Sincerely,

Michael Holford
Certification Officer



21 April 2013

Margaret Jenkins and Graeme McLaren
5756 Kamiaroi Highway
Breeza NSW 2381

Director Mining & Industry Projects
Department of Mining & Infrastructure

Submission on the Environmental Impact Statement (EIS) from Shenhua Watermark Coal.

Dear Sir,

We have lived on the properties owned by the Warmoll family for more than 20 years. My partner Graeme is the farm operations manager.

We live in the house shown as 32C on the EIS. It appears that our house will be the most severely effected in the whole area for noise, dust, and other pollution.

These things really upset us. But we are really worried about the projected levels of gases such as Nitrous Oxide and Carbon Monoxide.

We know that your findings are based on wind direction that we disagree with. Having lived here for over 20 years we know that a lot of strong wind comes from the west. The "westerly" is known as the most destructive with strong and gusty periods every year sometimes for weeks.

Dust will mean that we would have to truck water in because the tanks will not be usable.

We love working here and don't want to have to move because of health risks or lack of drinking and washing water.

Yours sincerely

Margaret and Graeme

Margaret a Jenkins

We make this submission to the EIS prepared for the Shenhua Watermark Coal mine development, and request confirmation of its receipt.

Yours sincerely,



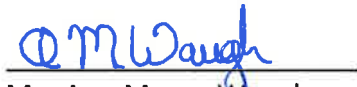
Mrs Lola Warmoll



Mr David Warmoll



Ms Louise Warmoll



Mrs Ann Maree Waugh



Mrs Elizabeth Warmoll



Mr Phillip Warmoll

Dated 23 April 2013