

**SUBMISSION OPPOSING GRANTING OF CONSENT TO NORTHERN COAL  
MODIFICATION SSD-5145. NORTHERN COAL LOGISTICS  
PROJECT.**

04 August 2020

**Preamble:** *It should be noted by Lake Macquarie's elected representatives and Council that Myuna Bay Colliery exceeded without penalty and without censure throughout the Lake Macquarie communities their greenhouse gas emissions in 2017-18 by 65%. What their excess is currently is not public, but what is known it will soon double and even more so. The umbrella of this colliery is Wangi Wangi. Myuna Bay Colliery seek to inflict upon the lakeside communities and the users of Wilton and Wangi Roads millions of tonnes of road hauled coal, a carbon footprint on a par with a third-world country. It will do so under the 'State significant industry' legislation as does Eraring Power Station road haul 500,000 of toxic ash on the same road system under 'beneficial use of ash'. Both these loopholes allow industry to operate with impunity. Eraring Power Station has plans to re-direct increased road haulage of ash using a route to the M1 avoiding Morisset, Dora Creek, Awaba, Toronto.*

As the recipient of **EMM Consultants NORTHERN COAL LOGISTICS PROJECT** dismissing the overwhelming content proving **Centennial Coal's** legal rights to mine Lake Macquarie, the prime points garner a view of utter dismay and disbelief does **EMM Consultants** and **Centennial Coal** share the same planet? Creating a rebuttal of an environmental absurdity the first rule is to eliminate any emotional or personal connotations, but this is impossible when you read a roadside sign in Wangi Wangi proclaiming **Centennial Coal** a proud member of the small lakeside community.

What is collated in this submission to disclaim an environmental catastrophe is focused not only at **Centennial Coal** and **EMM Consultants**, but at those whom the Lake Macquarie communities expect for leadership, who have it in their power of elected office to reject in its entirety this ill-conceived and catastrophic project. **EMM Consultants** not so original attempts to sugar-coat an industrial and environmental nightmare using job saving and contractual obligations beggar's belief when the past is the reality of the future.

**[1] Centennial Coal** plan to seek approval for the see-sawing [seems an adequate description] of 1.2 million tonnes of coal between the pitheads of Cooranbong and Myuna Bay Collieries, road hauled using the Private Coal Haul Road accessed at Wilton Road Awaba to Myuna Bay Colliery [Wangi Point Road intersecting Wangi Road]. On-site at both pitheads coal will be muddled [blended] to improve the quality acceptable to Eraring Power Station of low-grade Myuna Bay Colliery coal. Both collieries will blend in unison so maintaining contractual supply, and Myuna Bay Colliery's workforce employed. From Myuna Bay Colliery pithead blended coal will then as is current procedure be transferred via the Eraring Power Station Overland Conveyor System to the power station stockpile. From the Cooranbong Colliery pithead, higher grade coal would be blended with road transported Myuna Bay Colliery's low-grade coal and transferred by conveyor to the Eraring Power Station stockpile.

[2] 1.2 million tonnes of road hauled coal equates to 70,000 coal truck movements from Awaba [Wilton Road] to Wangi Road terminating at Wangi Point Road [Myuna Bay Colliery]. **EMM Consultants** state there is residential development 80 metres from the route [Donnelly Road], so it can be assumed **EMM Consultants** consider 80 metres a sufficient buffer zone to 1.2 million tonnes of road haulage. Assuredly those affected hold different views. No mention is made of similar residential development in Awaba, 100 metres from the Wilton Road access to the Coal Haul Road.

**EMM Consultant's** fail to inform that in addition to coal haulage Eraring Power Station use an identical route road hauling yearly 500,00 tonnes of top and bottom ash under the guise of 'beneficial use of ash' [Eraring Power Station plan to reopen the Coal Haul Road Toronto West exit/entry ramp increasing road haulage to 800,000 tonnes. This will channel heavy vehicles directly to the M1]. To highlight the environmental shadow both Eraring Power Station and **Centennial Coal** hang over Lake Macquarie a worst-case scenario is both combined processing raw and burnt product would be committing to the Lake Macquarie road system- predominantly Wilton and Wangi Roads- 2,000,000 tonnes a year.

[3] **EMM Consultants** have included empty and scenic rural roads in their consultancy brief, but no mention is made of the possible impact of coal haulage competing with the entire fleet of Lake Macquarie City Council's recycling and garbage trucks servicing the Wilton Road [Awaba] recycling facility. Ignored also the far and wide movement of heavy vehicles involved in coal haulage who will as a necessity use the entire Lake Macquarie road system to reposition, refuelling, maintenance, exchanging vehicles, breakdowns, towing.

Shaded graphs of turning widths and angles prove heavy vehicles can turn safely at Wilton Road intersecting with Wangi Road [B-double cement tankers loading fly ash at Eraring Power Station currently turn at the same intersection]. Are **EMM Consultants** aware heavy vehicles turning right face a stop sign, and to enter the flow of southbound traffic [13,000 vehicles daily] have to almost immediately merge left to the through lane with a speed limit of 80 kph?

Has **EMM Consultants** adjudged the safety to traffic northbound of Summerhill Drive, sharing the road with slow-moving coal trucks turning right either empty or loaded from the Myuna Bay Colliery? Heavy vehicles exiting Myuna Bay Colliery will be required to enter a steady traffic stream travelling at the posted speed limit of 90 kph? That the lane these heavy vehicles are entering is single for 100 metres before a divided carriageway? That the steep and long gradient will cause heavy vehicles to labour in a 90 kph zone, and due to the configuration of the road, a blind corner, cause dangerous lane changing at high speed?

**EMM Consultants** are of the opinion no perceived damage to Wangi Road is foreseen with coal haulage. When PowerCoal [**Centennial Coal**] road hauled coal from the Coal Haul Road exit at Toronto West to the Wyee road/rail receipt via the M1 [under a Lake Macquarie City Council's decree to return empty through residential Morisset and Dora Creek] turned Wangi Road into a goat track. Over a five-year period, the road surface for long lengths were repaved twice. To their credit **Centennial Coal** now transfer coal to Vales Point Power Station by rail, an incentive much welcomed by those who suffered this blight brought upon them by PowerCoal and a council ignoring their pleas. Now a single train replaces 4000 coal truck movements.

Each day Wangi Road is travelled by an average of 13,000 vehicles a day, much

of it heavy. It is a connector road to the Central Coast and the M1 north and southbound. Wangi Road services five major residential and commercial areas of Lake Macquarie, and even if the section of road chosen by **Centennial Coal** for their road haulage of coal is partially non-residential, it will become a chokepoint. In reality two chokepoints including Wilton Road.

**EMM Consultants** mention driver behaviour, which it is supposed **Centennial Coal** will diligently monitor and control. Act swiftly on advice from distraught motorists to eliminate convoying, speeding, tail-gaiting, intimidation, excessive use of compression braking. Reality referring to from the past tells a different story, residents who did complain, who witnessed near-fatal accidents involving coal trucks, fobbed off as no more than an irritation to doing business.

[4] A question is asked of **EMM Consultants** and **Centennial Coal**, a calculation of the diesel emissions of 70,000 heavy vehicle movements within a designated area of Lake Macquarie, its effects on the environment, or possibly bushland and a recycling facility isn't part of the equation? What is the carbon footprint of **Centennial Coal's** intended road haul of coal? Airborne emissions blending at the Myuna Bay pithead? Or has **EMM Consultants** dismissed such inconsequential matters as the means of creating and maintaining jobs? **EMM Consultants** state one of the reasons for inflicting this environmental travesty on Lake Macquarie is to protect the jobs, the seams of coal currently being mined unacceptable to Eraring Power Station. If we are to believe the infliction of 70,000 polluting, road destroying, heavy vehicles inundating Wilton and Wangi Roads, at a huge cost of haulage [PowerCoal opened their books for inspection] is to protect the livelihood of workers and not profit, the reality with highly publicised truth the mining mindset is when coal prices drop by a small dollar amount swathes of workers are laid off.

[5] It is the height of absurdity that **Centennial Coal** even contemplates road haulage of coal for blending. An exchange of coal between two collieries, and when blended at both pitheads transferred to the Eraring Power Stations stockpile. Myuna Bay Colliery at its pithead will blend its poor grade coal with high-grade coal from Cooranbong delivered by heavy vehicles, then by usual means transfer to Eraring Power Station by the Overland Coal Conveyor to the stockpile.

A question is asked of **EMM Consultants**, **Centennial Coal**, their engineers and miners with vast experience moving vast quantities of materials, why this see-saw? Why inflict upon Lake Macquarie for what may be the lifetime of Eraring Power Station scheduled to close in the 2030s, millions of tonnes of coal haulage on rural roads? Not being an engineer and not being particularly bright and amongst all this consulting talent am I the only one to see the solution? Possibly having a young family in the past exposed to life and sanity threatening bulk transfers helps. It would seem **EMM Consultants** and **Centennial Coal** are likeminded, Lake Macquarie and its politicians and councillors, commercial interests and residents, only too eager to share their environment with hundreds of thousands of coal trucks, toxic emissions, pollution of their waterways, air quality, as long as it equates to jobs.

[6] **EMM Consultants** though never once inferring this massive coal haulage will alter the normal daily traffic flows of Wangi Road unintentionally reveal the true impact of the blending project that lesser numbers of coal trucks will be inflicted upon Wilton and Wangi Roads during peak periods- five trucks an hour or one every

twelve minutes. Doesn't this infer this project's impact on Lake Macquarie and its road system?

**[7] THERE IS A SOLUTION OTHER THAN HEAVY VEHICLES.** *Cost-effective, environmentally safe, and protective of Lake Macquarie's residential amenity. Eraring Power Station onsite has the infrastructure for the blending of coal sourced from Myuna Bay and Cooranbong Collieries. Myuna Bay Colliery would continue to transfer their currently low-grade coal via the Overland Conveyor System to the Eraring Power Station stockpile [a section dedicated to low-grade coal]. Cooranbong Colliery coal from the pithead would be trucked to the Eraring Power Station stockpile, and using a shore-to-ship or similar portable loader [reference Toll-Chadwick Transport coal loading No.4 Western Basin, Carrington, 1983] blend both coals during the pour from Myuna Bay Colliery. The rate of blending determined only by the turnaround of trucks feeding the portable loader's hopper, and if competently organised would easily match Eraring Power Station's 1000 tph rate or less to correctly balance the grades of coal. Possibly the old Wickham transport firm might have a couple of second-hand portable loaders rusting away somewhere in long grass. It is suggested Centennial Coal may like to liaise with Port Waratah Coal Services on how to environmentally blend grades of coal surrounded by the city of Newcastle.*

**Conclusion:** EMM Consultants recommendations for the transfer of coal between the pitheads of Cooranbong and Myuna Bay Collieries for the purpose of blending should be dismissed outright. That the entire submission recommending Wilton and Wangi Roads, major connector roads to large residential and commercial area, be swamped with millions of tonnes of coal truck movements is incomprehensible and irresponsible.

This brings into serious doubt **EMM Consultants** and **Centennial Coal's** their professed environmental credentials, their corporate inability to look no farther than coal trucks on narrow rural roads to correct an imbalance of coal grades.

Which brings with this submission no need to apologise for its emotional content. When you carry a burden of past dealings with management elite, falsity, unkept promises, and environmental policies that are no more than a charade intended for glossy brochures, there is no need for an excuse to temper your feelings. **To EMM Consultants** and **Centennial Coal**, coal trucks no, people yes.

Sincerely,  
Wayne Ward