

**Our Reference:** 1898958:DLA  
**Your Reference:** MP10\_0138 Mod 8  
**Contact Name:** Donna Ausling

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Via Email: [Philip.Nevill@planning.nsw.gov.au](mailto:Philip.Nevill@planning.nsw.gov.au)

Tuesday, 19 October 2021

**Re: Maules Creek Coal Mine – Mod 8 – Mobile Coal Sizing and Waste Tyre Disposal (MP10\_0138-Mod-8)**

Dear Sir

Thank you for the request for advice in relation to the abovementioned project. Council has revised the following document:

- *Maules Creek Coal Mine – Mobile Coal Sizing and Waste Tyre Disposal Modification Report (Whitehaven Coal, September 2021)*

Council understands that the proposed is to enable:

- (a) The use of mobile coal sizing equipment located in the vicinity of the ROM stockpile area and within the open cut pit;
- (b) The use of mobile rock crushing equipment located in the Northern Emplacement Area; and
- (c) Disposal of waste heavy vehicle tyres in the waste rock emplacement areas.

The proponent's advice that the Modification does not propose to change the approved ROM extraction or product coal transport rates for the Maules Creek Coal Mine (MCCM), nor any other operational or closure aspect of the mine is acknowledged. It is further noted that the Modification can be implemented in accordance with the existing environmental limits and performance measures for the MCCM, with no associated increase to the proposed disturbance footprint.

Council provides the following feedback and recommendations to the Department in relation to this proposal:

### **1. Waste Management**

Council acknowledges that at the current time significant financial and physical barriers exist in respect of the recycling of end-of-life heavy mining plant tyres. It is further noted that waste tyre management options are currently limited for mining operations in NSW and across Australia, due to a general lack of available recycling technologies and transportation impediments.



  
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As you are aware, the *Waste Avoidance and Resource Recovery Act 2001* is underpinned by the waste hierarchy. The waste hierarchy encourages waste avoidance and reduction as the first priority. Resource recovery, including reuse, recycling, reprocessing and energy recycling is considered the second priority. Where the first two priorities are not feasible, waste disposal in an environmentally responsible manner should only then be considered. In relation to tyre waste management it is therefore recommended that:

- (a) The approval authority require that the proponent undertake a review of available recycling for end of life heavy mining plant tyres at recurrent intervals throughout the remaining life of the mine.
- (b) A limitation be imposed on the number of, and origin of tyres that can be disposed of at the premises in any one year.
- (c) Only waste tyres generated at the premises may be disposed of on the subject site.
- (d) No specific objections are raised to the proposed disposal of heavy vehicle tyres in spoil emplacement areas on the basis that the tyres are placed as deep as possible, but not directly on the pit or emplacement floor. Any associated placement activities should ensure that waste tyres do not impede saturated aquifers or compromise the stability of the consolidated final landform.
- (e) Temporary tyre stockpile areas should be subject to an ongoing and robust monitoring and management program to ensure that stored tyres do not provide an environment that promotes harbourage of vermin or encourages mosquito breeding. Appropriate mitigation and management measures should be put in place in respect of potential stockpile fires.

Council is generally supportive of the proponent's intention to:

- (a) Maintain a comprehensive inventory of all waste heavy vehicle tyres buried on site, including within waste rock emplacement areas; and
- (b) Undertake preliminary Environmental Risk Assessments prior to the selection of an appropriate disposal area for the waste heavy vehicle tyres.

## **2. Noise and Air Quality Impacts**

In line with the commitments made in the submitted Modification Report, the proponent should continue to implement existing noise mitigation measures, including real-time and proactive noise management systems, to ensure ongoing compliance with the noise limits prescribed under PA 10\_0138. Where appropriate, the Noise Management Plan (NMP) and any associated approvals frameworks should be updated to incorporate the modification, if endorsed.

The proponent should continue to implement existing dust mitigation measures described in the Air Quality Management Plan (AQMP), including operational and physical mitigation measures, to ensure compliance with the dust limits prescribed in PA 10\_0138. The AQMP should be updated accordingly if project approval is issued.

It is noted that the proposal seeks to introduce mobile coal sizing equipment and a crushing plant. Given the significant number of infrastructure projects occurring in the area and in proximity to the site, including the Inland Rail project, consideration should be given to placing specific limitations in respect of site operations including restricting importation of offsite materials for crushing and screening, in addition to exportation of any processed materials outside of the scope of nominated site operational particulars.

The submitted noise assessment identifies that receiver 108a is likely to be subject to operational noise exceedances. On this basis, ongoing efforts should be sustained in respect of acquisition and 'noise mitigation on request rights' in accordance with Conditions 1 and 2, Schedule 3, of the Project Approval.

Thank you for the opportunity to provide feedback in relation to this matter. Should you require any additional information in relation to the above you are invited to contact Council's Manager of Strategic Planning, Ms Donna Ausling on (02) 6799 6866, or by emailing [council@narrabri.nsw.gov.au](mailto:council@narrabri.nsw.gov.au).

Yours faithfully



**Andrew Brown**

Director Planning, Strategy & People