



Resource and Energy Assessments  
Department of Planning & Environment  
GPO Box 39  
SYDNEY NSW 2001

16 December 2020

Dear Sir/Madam

**Re: Submission – Application Number SSD 10269  
Narrabri Underground Mine Stage 3 Extension Project**

I refer to the abovementioned development application currently on exhibition.

It should be noted that although the development project is located entirely within the Narrabri Shire Local Government Area (LGA), the submitted Environmental Impact Statement (EIS) and Social Impact Assessment (SIA) identifies that given the proximity of the Gunnedah LGA and the township of Gunnedah, the development will have direct impacts associated with mining workers that will reside within the Gunnedah LGA, as well as the traffic movements associated with mining activity.

Council is keen to ensure that the development is conducted in accordance with the definition of Ecological Sustainable Development and adopts the Precautionary Principle. This development and other developments of similar activity should be evaluated based on strong sustainability principles to ensure that the natural environment is not degraded in the face of economic capital.

Council would like to take this opportunity to make a submission in regards to the development proposal. Council believes that the following matters of concern require the provision of additional information or require the imposition of a condition of consent to ensure that the development is conducted in an acceptable manner.

***Impacts from extended use of Rail Infrastructure***

The EIS does not appear to contain any information with regards to any consideration having been made as to the potential cumulative impacts on communities located along the rail corridors between the development site and the Port of Newcastle, for which haulage will occur for the increased life of the development from 2031 to 2044. The EIS also does not appear to make consideration to the allocation of rail capacity outside of the current approved lifespan in light of additional mining activities being approved in the region (Vickery Extension Project).

***Social and Economic Impacts***

The Social Impact Assessment provided for consideration, has analysed the impacts related to the Project, including the proposed mine life and extension to 2044, as well as the geographic extension to the south of the approved underground mining area to gain access to additional coal reserves within Mining Lease Application (MLA 1 and 2). As stated in the document, the SIA and the

accompanying Scoping Report have been prepared in line with the requirements outlined in the NSW Department of Planning and Environment Social Impact Assessment Guidelines for State Significant Mining, Petroleum Production and Extractive Industry Development 2017. The following observations in relation to the SIA are made:

- Potential Positive Impacts relevant to the Gunnedah Shire:
  - Maintained provision of jobs and training for local residents
  - Continued community contributions supporting positive social outcomes, social infrastructure investments and/or community resilience improvements
  - Ongoing investments and jobs creation opportunities for local businesses
  - Ongoing contribution to economic diversity and economic resilience
- Potential Negative Impacts relevant to the Gunnedah Shire:
  - Community anxiety and concerns around climate change, and the ongoing preservation and security of groundwater supply
  - Negative perceptions around the impact of mining operations on the community's way of life
- *Community Engagement:*
  - Council acknowledges the efforts by the Project to engage with stakeholders across the region. The community survey is comprehensive and provides significant opportunity for respondents to 'have their say', and while the take up rate is low, Council is aware that significant effort was made to disseminate the survey throughout the community in order to encourage participation across the Gunnedah Local Government Area. While no community forums appear to have been undertaken, COVID-19 impacts on the planning of public meetings have been considerable. Survey findings were generally supportive of the projects impacts for the Gunnedah Shire. Moving forward the commitment of the mine to ongoing engagement with key stakeholders (as articulated throughout the SIA) including Gunnedah Shire Council is expected.
- *Social Baseline:*
  - Section 4 provides a comprehensive social baseline analysis of datasets which include: employment, community cohesion, housing affordability, key health determinants, crime, social infrastructure, Aboriginal values, air quality, water quality, fear and anxiety. Findings suggest that negative impacts on the Gunnedah Shire are negligible and that to the contrary, Stage 3 provides additional benefits in relation to the continued growth of the Shire.
  - Approximately 39% of all mine operational staff are estimated to currently reside in Gunnedah (145 people). Additional resident workers that are required to support the extended operation of the project are expected to generate additional resident population albeit minimal, if singles and families opt to relocate to the region. Based on an average operational workforce of 370 employees, it is assumed an additional 40 non-resident and transient (FIFO/DIDO) workers are accommodated in Gunnedah and utilise local infrastructure and services. The SIA indicates that in 2019, 53 Narrabri Mine workers lived in Queensland or in parts of NSW outside of Narrabri LGA, Gunnedah LGA, Tamworth LGA and Gwydir LGA and it is unlikely that the Stage 3 extension project will result in a different outcome. A best case scenario would see a total of approximately 16 currently employed workers that may decide to move to the local area. It is expected that the non-resident (FIFO/DIDO) workforce would not place a high demand on services.
- *Employment:*
  - While noting the positive impacts that the project will continue to have on local employment, significant skills and labour shortages within the Gunnedah Shire remain. Ensuring strategies are in place to address the migration of trained workers from local businesses to the mining industry, and to ensure each industry in the Shire has sufficient resources to thrive, is of paramount importance to Council. Displacement of employment opportunities from the agricultural sector also needs to be considered within the social and economic assessments. Training programs, graduate placements in industry and community grants grow human capital by building competence, skills and knowledge, education and

experience. Jobs creation in the mining sector and associated industries supports the retention of young people in the Gunnedah LGA and the availability of jobs that the increased mine life will bring will over time, also has the potential to draw young people back to their community to work, live and raise families. Management measures articulated within the Executive Summary around employment and procurement management are applauded.

- Council acknowledges that the SIA has made a strong commitment to promote training programs and apprenticeships as well as promoting employment opportunities for indigenous persons within their operations. Council requests that any development consent require ongoing commitment to these practices by achieving a target of at least 10% staff Indigenous employment. Furthermore that ongoing efforts be made to source Indigenous trainees and apprentices from within the surrounding local communities.

#### ***Rehabilitation Plan Update***

Council suggests that the mine Rehabilitation Plan for the previous mine approval (Stages 1 and 2) should be updated to include additional impacted areas as a result of the proposed development works and any infrastructure required for the extension of the Narrabri Underground Mine Stage 3 Extension Project.

#### ***Financial Contribution to Gunnedah Shire Council***

Gunnedah Shire Council wishes to foreshadow entering into a Voluntary Planning Agreement (VPA) with the proponent. Council would support any such discussions as a way to offset economic and social impact that this development will incur on the wider Gunnedah Shire Community. It is noted that a significant percentage of the workforce of the existing and proposed new extension to the mine are and will be domiciled in the Gunnedah Shire.

At the time of this correspondence no formal discussions had occurred between the proponent and Council. It is suggested that the development determination should not occur until such time as a VPA has been endorsed or a condition be imposed to this effect.

#### ***Review of any future amendments to documentation***

Upon updating of the relevant sections of the development EIS and any amendments to the development proposal Council would appreciate the opportunity to review any amended documents and be enabled to provide any comments and submission at such a time.

If you have any questions regarding this matter, please contact Council's Senior Development Assessment Officer, Wade Hudson on 02 6740 2100.

Yours faithfully



Andrew Johns

DIRECTOR PLANNING AND ENVIRONMENTAL SERVICES

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Reference: wh:bg