

Enquiries
Please ask for Joshua Brown
Direct 02 6549 3744
Our ref
Your ref

23 November 2018

**Commissioner Gordon Kirkby
Independent Planning Commission Panel
Level 3, 201 Elizabeth Street
SYDNEY NSW 2000**

Dear Commissioner,

Re: Bylong Coal Project

I refer to our meeting of 12 November 2018 with the Independent Planning Commission Panel examining the proposed Bylong Coal Project. You will recall that Muswellbrook Shire Council took a number of questions on notice at our meeting and I am pleased to provide you with the following additional submissions in response.

In addition to the below submissions, Council relies on its written and oral submissions provided to the Commissioners on the abovementioned date.

Mine worker travel patterns

63.36 percent of the Muswellbrook Local Government Area (LGA) mining workforce lives outside the LGA and commutes to work¹. Across Australia, Mineworkers are over-represented in the commuter fatality rate. In 2009/10, mining industry workers recorded the highest rate of commuter fatalities at 2.3 commuter deaths per 100,000 workers. ²Between July 2003 and June 2010, the mining industry recorded the highest rate of commuter fatalities for each year, with the exception of 2007/08 when it was recorded as the second highest.³

Calculation of road maintenance bank guarantee/security

Council is unable to retrospectively remedy road impacts attributed to any demonstrated non-compliance identified by traffic monitoring of mine related heavy vehicles using the Bylong Valley Way east of Wollar Road. The security represents an equivalent of two years' road maintenance (pavement rehabilitation) costs calculated by Council's engineers and provided to the proponent .

¹ Australian Bureau of Statistics *2016 Census of Population and Housing*

² Safework Australia (2012) *Work-related Traumatic Injury Fatalities, Australia 2009–10*.

³ *Ibid*

Bus transport of workforce

Council would support the use of buses to transport workers to the mine site, provided that buses use only the prescribed routes and are the only means by which workers are able to access the site.

Further Council would require that the operators of the mine be compelled to meet the above provisos by the conditions of any project approval the Commission may be minded to grant.

Council notes that the Mt Pleasant Mine currently transports mine workers to the mine site by bus; however, this is not a requirement of the conditions of the relevant project approval.

In Council's submission, road safety and the safety of road users cannot be left to the unilateral discretion of the proponent. The Commission, in granting any approval for the project, must ensure that an appropriate and enforceable condition is imposed.

Thank you for the opportunity for Council to make these further submissions in respect of the proposal. Should you require further information please do not hesitate to contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'F. Plesman', followed by a period.

Fiona Plesman
General Manager

(NRA)