

From: [REDACTED]
Sent: Wednesday, 8 October 2014 6:17 PM
To: [REDACTED]@newhopegroup.com.au; [REDACTED]
[REDACTED]@newhopegroup.com.au)
Cc: newaclandproject@coordinatorgeneral.qld.gov.au; [REDACTED]
[REDACTED]@coordinatorgeneral.qld.gov.au)
Subject: TRIM: Information request: issues raised in AEIS submissions; CGER requirements
Attachments: [REDACTED] aeis-submission-fact-sheet-and-form-new-acland.docx; ExpertNoise Report_New Hope Coal EIS_ARB.pdf; submission on additional EIS information; [REDACTED] New Acland AEIS - [REDACTED].pdf; FINAL Stage 3 AEIS [REDACTED] resp_280914.pdf; FW: Social Impacts -New Acland Stage 3; Submission on the New Acland Coal Mine Stage 3 project signed.docx; [REDACTED] Response to NAC Additional Information.pdf

HP TRIM Record Number: E14/279548

As discussed [REDACTED] and I have reviewed AEIS submissions and request the following information be provided to inform development of the CGER:

1. Provide a high resolution copy of figure 3-4 (EIS Appendix 20: MNES)
2. What is the total amount of vegetation to be cleared for the project (excluding REs/TECs)
3. Further to ADP email dated 29/8/14 5:23PM re landholders likely to be impacted by groundwater drawdown: please clarify a) the total number of bores potentially impacted in the maximum extent, including NHG owned bores b) how many landholders own the bores – and of this, how many bores NHG owns.
4. For the [REDACTED] submission – please note all comments.
5. From the submission, a response is sought on the following items:
 - pages 29, 30: mine water usage, including TRC WWTP supply figures vs. EIS data; and respond to comment regarding preferential use of bore water
 - page 30: comment regarding Oakey waste water use and potential hazards of its use. Additionally - how is the brine used on-site; and what quantities are likely to be sourced for the project?
6. Response to attached pdf 'Expert Noise Report [etc]' section 4.2
7. Note comments in attached email 'submission on additional EIS information' by [REDACTED]
8. From the submission, please respond to:
 - Page 13 – monitoring at [REDACTED] residence
 - Pg 14 – proximity to above [REDACTED]
9. State why purchase of the Tom Doherty Park is still sought given it has been excised from the MLA. Has NHG sought confirmation on if the purchase is still able to be achieved?
10. Provide information on the company's feedlot development and consider the feedlot in the context of EIS chapter 20: cumulative impacts
11. Note comments in attached submission from [REDACTED] pdf 'DEPC14 [REDACTED] [etc]', including Acland maintenance and management suggestions.
12. From the submission, respond to:
 - Page 11 re EMP section 3:14:2
 - Page 20 re 5.3.44.3. re blasting fume events – when was the last event? How frequently have these occurred in recent years?
13. Note comments in submission from [REDACTED] pdf 'FINAL Stage 3 AEIS [REDACTED] [etc]'
14. From the submission, respond to:
 - Page 8 - comment regarding age of study that informed discussion on agricultural trends

- methodology*
- Pg 12 – choice of BOM dataset re evaporation
 - Pg 33-34 – assumptions used for GGEs – noted section 10.4.2 of the EIS does not specifically address assumptions

SIA considerations

15. [See attached email 'FW: Social Impacts – New Acland stage 3' emailed to you last week – noted you said today this was being worked on; included here for completeness]

16. COMMENTS ON CONSULTATION AND ENGAGEMENT

Given the number of issues raised here which relate to the consultation, engagement, negotiation and information provision which are critical of the processes and procedures adopted by NAC during their current operations and throughout the EIS Process for stage 3, the CG should be informed about when the improved communication and engagement strategies will be implemented and what these process will look like for residents that will be different to current practice. Also how will they be informed about the improved approach specifically rather than simply state that this has happened as part of the public notification of the AEIS.

17. My view would be that best practice communication means- as a key business strategy you inform and explain to your audience your range of communication strategies how these will be delivered, the frequency of delivery and the range of information that will be provided(Mitigation and Management commitments) - you then implement the strategies ensuring you deliver the promised communication strategies and also deliver on the outcomes you commit to as a result of communication. JRLF may be good example of where NAC has failed, in this regard (subject to the response from NAC on increased Mpta

18. If NHG specifically provided information as suggested above (perhaps in a newsletter which was solely focussed on Communication and Engagement) to residents this would also need to reference process and procedures for the following:

- Acland Management Plan
- Acland Colliery Conservation Plan
- Air Quality - Dust- Blasting - Vibration
- Water Resources
- Noise
- Complaints and Dispute Resolution process
- JRLF Monitoring of Operation and Decommissioning - OCCA refer to increased railing volumes
- Community Reference Group Process
- Road Closures
- Opportunities for Community Involvement and process related to this
- Land holder agreement process.
- Health Impacts.

19. A key section of the community do not see NAC as a good corporate neighbour and NAC need to work harder to demonstrate their credibility, trust and strengthen their social licence to operate.

20. WORKFORCE NUMBERS

Given continued downturn in the mining industry and associated job losses should we seek clarification from NAC there current and predicted workforce numbers if this expansion proceeds. An up to date position would be useful when writing workforce management section of Social Chapter ad would enable us to ensure we have the latest information from NAC even if this has not changed.

concerns

A number of AEIS submitters has raised the question of validity of EIS job numbers given recent shift reductions and trialling of new equipment (e.g. Wirtgen) that may result in further job losses. Please respond to page 2 'economic benefits' of attached Word document: Submission on the New Acland Coal Mine [etc].docx' – submission from [REDACTED]

21. COMMENTS ON COMMUNITY ENGAGEMENT ACTION PLAN

Community Reference Group

22. NAC state on their website that the Community Reference Group "was established through a transparent and equitable process to select representatives from across the region as foundation members". It would be good if NAC could provide us with details of the process adopted for the establishment of this group and the appointment of any

future members. In addition to this they reference a CRG Charter (which details roles) for the group in the EIS consultation Chapter. I suggest that we request a copy of this.

This information will help us understanding process, operation and roles.

23. Community Complaint and Dispute Resolution Mechanism

Suggest the issue raised by [REDACTED] (BOTTOM OF PAGE 18) are clarified by NAC

24. See attached pdf submission [REDACTED] [etc]' – respond to statement that TOR requirements regarding investigation of mental health context and impacts has not been addressed (7) – *complaints / consultation*
health & wellbeing

[Following relates to 'Project Memorandum No. 2_ Version 2' issued by NHG 2/10/14. For where [REDACTED] has noted response, nothing further is needed]

25. 7.1 Road Closures

26. Issues 1-5 and 8-10

Further to your reply to the issues raised in relation to road closures these are noted. However they are not considered to be sufficient to deal with the mitigation and management of the direct impacts that will affect residents as result of these closures. It is acknowledged that the Acland / Sabine Road provides a partial mitigation for residents but does not allow (em to continue to access utilise and enjoy the region fully (as they currently are able to do) without experiencing additional specific impacts detailed ion my email of the 25 September as a direct result of the stage 3 expansion.. Given the requirement of the Terms of Reference to provide strategies as part of the EIS process that mitigate and manage direct impacts, advice will now be sought from the Coordinator General in regard to if there is the requirement to condition suitable outcomes to enable the resolution of the road closure impacts for residents.

27. Issue 6

Thanks for clarifying that Acland /Sabine Road will be fully sealed.

28. Issue 7

Given NAC response and their commitment to seal the Acland/Sabine can an additional commitment please be include in the commitment register that states " that the upgrade works along the Acland / Sabine Road will be undertaken before any road closures to ensure access to Acland township is maintained at all times"

29. 7.2 Community Reference Group/Community Information Sessions/ Community Newsletters

() Issues 2a-2c

Noted and Minutes reviewed

31. Issue 2d

I take from your response that there has not been any specific group or individual information session in regard to the enhanced consultation and engagement process and practices or the specific issue raised by submitters between the closure of the public information period for the EIS and the public information period for the AEIS.

32. Can you tell me the extended operating hours of the NHG Community Information Centre and also the proposed dates for the forthcoming information sessions referred to in your response to assist me with drafting the CG Report.

33. Issue 2e

Noted

34. 7.3 Jondaryan Rail Load Out Facility

Noted – will come back to you if any further clarification required

35. 7.4 Acland War Memorial – Tom Doherty Park

Noted

With thanks

[REDACTED]

[REDACTED]
Project Manager
Coordinated Project Delivery
Office of the Coordinator-General
Queensland Government
tel [REDACTED]
post PO Box 15517 City East Qld 4002
visit Level 4, 63 George Street, Brisbane
[REDACTED]@coordinatorgeneral.qld.gov.au

Customers first Ideas into action Unleash potential Grow agencies Empower people

[REDACTED]

From: [REDACTED]@bigpond.com>
Sent: Monday, 29 September 2014 4:19 PM
To: New Acland Coal 3; [REDACTED]
Subject: [REDACTED] aeis-submission-fact-sheet-and-form-new-acland.docx
Attachments: [REDACTED] aeis-submission-fact-sheet-and-form-new-acland.docx

Dear [REDACTED]
Please find attached [REDACTED] submission on the AEIS.
If you require signatures from the other Executive members I can collect them later to send.
We ran out of time to address all issues, but please let us know if you require more information.
kindest regards

[REDACTED]
[REDACTED]
[REDACTED]

<p>2. 5.2.5. <i>Health and Community Wellbeing</i></p> <p>The Action Plan claims it will 'implement a program of noise and dust management, including coal veneering, enclosed hoppers and noise management' Community members have been continually requesting improved environmental management, dust and noise mitigation of NAC including enclosed hoppers. Why has this not been instituted earlier instead of waiting until the expansion occurs (2016 or later?). This shows a disregard of valid current and past complaints where we have asked for better coal handling practices. Past and current environmental management gives us little confidence NAC will be any better in the future, and our communities are destined for poor health and living conditions if approval is given.</p>	<p>Judge NAC on past poor environmental management rather than promises of wondrously improved future dust and noise mitigation.</p> <p>Look at the history of ignoring community concerns at Jondaryan, including blaming everyone and everything else (insects, birds, highway traffic, municipal dump traffic, local farmers, local fires, grain storage depot) for the dust levels.</p> <p>Review the March- September real time monitoring at Jondaryan and compare to New Acland's flawed monitoring.</p>
<p>Coal veneering has not been successful in reducing pollution and nuisance dust concerns in Jondaryan. It has only partial efficacy at reducing coal dust from trains. It has no impact on reducing coal dust pollution from empty return carriages.</p>	
<p>Re Action ; Maintain the township of Acland , including Tom Doherty Park, the War Memorial, and the Acland No2 Colliery</p> <p>It is particularly offensive to [REDACTED] and other Acland and Oakey district members that New Hope intend to take over care of the Park and the town. This will fail and cause added conflict and stress to residents. The Park has been well maintained previously by community with some input by TRC.</p> <p>We have no faith or trust in their ability to look after this Park- which was planted, cared for and added to by the Acland community over the years. NAC seem to be totally insensitive to community opinion in this regard.</p> <p>In response to public submissions on this issue, NAC stated they would consult Goombungee RSL on the War memorial. This is not an RSL memorial but a community funded and built memorial. It has nothing to do with the RSL.</p>	<p>Do not allow NAC to maintain Tom Doherty park or manage war memorial</p>
<p>Re Statement 'Maintain a community grievance mechanism to allow landholders and other stakeholders to lodge issues, concerns, questions or suggestions and have them responded to in a timely manner' and responsibility for this is 'NAC and contractor'. What does this actually mean?? Is NAC outsourcing this responsibility to a third party? Do they do this currently as it says 'ongoing'. Why is there no mention of this third party contractor elsewhere? Is this a mechanism for NAC to avoid or deflect responsibility for community liaison issues?</p>	<p>Explain.</p>

MINE WATER USAGE. This is an issue of real concern for the future viability of farming at Acland. We presented data to the CG in August 2014 explaining how their water balance is dishonest. We have no faith in NAC modelling of GW impacts as they underestimate impacts. Make good agreements will fail, They are unsustainable in the long term
Acland Mine water usage- current

Year	2009	2010	2011	2012	2013	2014 (YTD)
Jan		0	11	64	54	85.1
Feb		0	6.6	41.4	5.8	109
Mar		0	41.6	109	10.5*	80.5
Apr		0	75.3		11.5	27.9
May		0	97.4		32.8	29.9
Jun		8.9	74.7	88.6	0.94	77.9
Jul		5.8	126	55.9	74.3	141
Aug		50.2	0.41**	7.7	78.6	
Sep		26.6	36.9	84.9	90.6	
Oct	0"	39.4	14	116*	94.3	
Nov	0	33#	24.8	45.8		
Dec	0		67.2	30.9	33.1	
Actual WWW use ¹ .	0	163.9	575.9	644.2	486.4	551.3
Ave monthly water ¹ .		14.9	48.0	64.4	44.2	78.8
Water usage at mine ² .	5712	5712	5712	5712	5712	5712
Tailings recycle ³ .	2860	2860	2860	2860	2860	2860
Inflows to mine pit ⁴ .	740	740	740	740	740	740
Stated WWW usage ^{5,6} .	2112	2112	2112	2112	2112	2112
Shortfall in WWW (ML) ⁷ .	2112	1948	1537	1468	1626	1561

Comments from TRC council Minutes <http://www.toowoombarc.qld.gov.au/> (these types of comments repeated frequently)

*Take significantly below the available maximum.

+ Intake increased significantly compared to previous month but NAC take still significantly below maximum

(cont)

Comments from TRC council Minutes <http://www.toowoombarc.qld.gov.au/> (these types of comments repeated frequently)

*Take significantly below the available maximum.

+ Intake increased significantly compared to previous month but NAC take still significantly below maximum

** NAC recycled water increased from Feb to July but minimal pumping in August

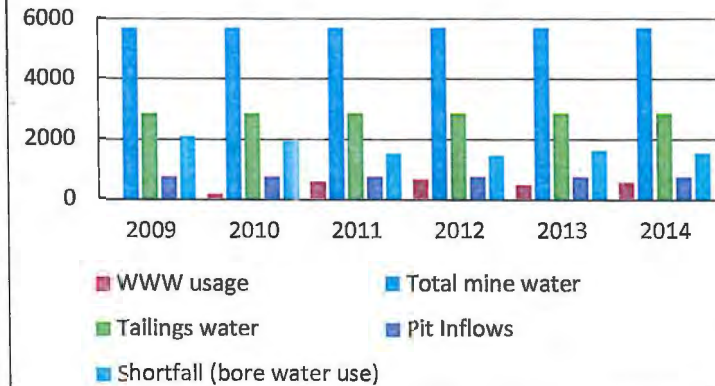
#Expect 120ML/mth from 30/1/09 to 2010/11. YTD significantly less, adjusted at 3 month review.

" NAC expected volume 150ML/mth from December 2009.

Source of figures:

8. Monthly Wetalla Waste Water purchased (TRC OGM of Council meetings minutes)
9. Mine water usage from Table 5:17 2014 Revised Stage 3 EIS
10. Tailings recycled water used for washing (Table 5:17 Revised Stage 3 EIS)
11. Inflows from rain and bore water leakage into pit (Table 5:17 Revised Stage 3 EIS)
12. Amount of Wetalla Waste Water inferred (Total net water usage) (Total water usage – (Tailings + Inflows)).
13. Table 5:16 of EIS Mine Water Inflows. 'Deep and Shallow Groundwater Bores not considered in the mine water balance. Water balance assumes zero inputs from groundwater bores'.
14. Shortfall in water usage (ML of water) = Net water usage- WWW purchased from TRC= likely bore water consumption by NAC from GAB and/ or local bores.

Mine water usage NAC ML per annum



██████ believe that the mine is using bore water preferentially, despite glossy PR campaign to the contrary. Mine pits are also filling with ground water.

Use of RO waste brine stream needs careful investigation in light of PEFOS contamination at Oakey Army Base- this contaminant is removed in RO process so will end up in Brine stream.

[REDACTED]

From: [REDACTED]@hotmail.com>
Sent: Sunday, 28 September 2014 11:31 PM
To: New Acland Coal 3; [REDACTED]
Subject: submission on additional EIS information
Attachments: AEIresponseDRAFTSept2014_tosend28092014.pdf; [REDACTED]2011recap.pdf; [REDACTED].pdf; emailto[REDACTED]12Feb2012.pdf; emailto[REDACTED]2011renoise.pdf; emailto[REDACTED].pdf; emailto[REDACTED]November2011.pdf; emailto[REDACTED]5March2012.pdf; australia_coal_price.pdf; coal-miners-axe-jobs-as-.pdf; [REDACTED] et al 2014 The development and significance of the fossil fuel divestment movement.pdf; ExpertAirqualityreport_New Hope CoalStage 3 EIS_additional comment.pdf; ExpertNoise Report_New Hope Coal EIS_ARB.pdf; receptorsammended.pdf; [REDACTED]Aust23July2011.pdf; Judgement2007QPEC07-112.pdf

Dear [REDACTED] and others,

Please find attached my submission and related attachments as further comment on the AEIS re New Acland Coal's revised Stage 3 proposal. Please consider this in addition to my previous properly made submission. Please do not hesitate to contact me if you have any concerns or queries in relation to the attached or any other issue in relation to this project.

I am sorry that time, illnesses and other responsibilities have limited my capacity to respond. I hope and trust that you will navigate the format and issues ok but please don't hesitate to contact me if anything is unclear.

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Oakey Qld 4401

[REDACTED]

[REDACTED]

example. I hope that people in such situations would have adequate rights. Similarly, I hope that landowners even without houses on their land, would be appropriately recognized.

In section 5.3.1.1 NAC commits that "NAC will ensure that it has reached legal agreement with all potentially affected landholders prior to the commencement of the revised Project." How can they be sure that they could reach such agreements "as soon as practical and in an amicable and fair manner" as they assert? How would they force people into an "agreement" in a particular timeframe?

Some information in response to the Mine's statements in section 5.3.21. [REDACTED] [REDACTED]

Monitoring at [REDACTED] and misleading statements

The proponent states "In addition, the extensive range of air quality and noise monitoring conducted regularly at [REDACTED] since the commencement of operations at the Mine has failed to identify any significant issues." (p211) This is entirely misleading and based on lies.

As well as checking with [REDACTED] I also checked this with [REDACTED] who does the noise monitoring for the mine to check whether he was aware of any monitoring also. No-one is aware of any noise monitoring being done at [REDACTED], with the possible exception that there may or may not have been a noise measurement taken over a decade ago either before the mine started or soon after. The proponent's statement that there has been "extensive range of air quality and noise monitoring conducted regularly at [REDACTED] [REDACTED] since the commencement of operations at the Mine" is blatantly untrue.

The "extensive air quality... monitoring ..." at [REDACTED] referred to is only a funnel in a jar about 400m down the hill from [REDACTED] and the quarterly PM10 monitoring done just north from [REDACTED] (on the side away from the mine, sheltered by the house). I have previously noted concerns about the validity of the PM10 monitoring given both that the mine is advised of it in advance and also that the samples often seem to be after rain. Further, if memory serves me correctly, any high levels of dust found in the depositional monitor seem to have been dismissed by the mine as supposedly been due to farming despite the absence of any evidence to support this.

The mine also states that "NAC has conducted dust deposition, surface water, groundwater, PM10 and noise monitoring at [REDACTED]. A majority of this monitoring has been conducted on a regular basis since the Mine commenced operations in 2002." This is erroneous and misleading in that it would seem to significantly overplay the amount of monitoring that has been done and its location.

I have noted above serious doubts about whether any noise monitoring has EVER been done at ██████████ and believe categorically that none has been done within the last decade or so and if any was ever done it was a limited sample many, many years ago.

Further, there has been very little water monitoring. The mine specifically ceased monitoring any ground water (they were only monitoring 1 bore anyway) on our property many, many years ago. I also doubt that there has been much surface water monitoring at all. When showing NAC staff around parts ██████████ in relation to possible surface water monitoring locations after a flood event I recall that the Environmental Officer expressed an unwillingness to get a sample from anywhere that might require much walking.

As I note elsewhere, they do have a funnel in a jar for dust deposition down the hill several hundred metres away ██████████ and do sometimes (max of 4 days a year) have a PM10 monitoring machine located in a spot just to the north of their house (the other side to the mine).

Given the above, I don't believe that the proponent's statement at all acknowledges the limitations and deficiencies of their monitoring.

I suggest that the Government request the mine to provide all the actual results to monitoring that NAC have collected to see exactly what has and has not been done in terms of monitoring. This should be provided together with a statutory declaration from the people who collected the data to try to ensure the veracity of the data provided. Ideally this should be forwarded directly as sent from any external consultants where applicable.

Modelling issues

The mine also stated that they modelled "' worst case' scenarios and that "the various air quality and noise models completed for the revised Project failed to identify any significant impacts at ██████████." Given that the intensity and proximity of the mining activity will increase (i.e. closer to the residence and larger scale) and that the mine is already causing significant problems such as noise at this residence, it would suggest this may identify a problem with the models. Further, as I and others have noted in previous submissions, they have not actually modelled the worst case scenarios.

Proximity to Mine ██████████

The proponent's statement that "the revised Project's active mining operations are moving further away from ██████████" is untrue. The area where the mine is currently mining stage 2 on the eastern side of Bottle tree hill is noticeably further away from ██████████ than the northern parts of the Manning Vale West Pit. (see maps e.g. Figure 5.1.2C noting that ██████████ is just to the right of the index table at the top left. Approx. 13.5 cm with stage 2 vs 9.5cm with Manning Vale West in Stage 3. The scale as printed seems to be approx. 13mm / km i.e. stage 2 mining approximately 10km away whereas Stage 3 pits will be approx. 7.3km). Also consider that there will be out of pit dumping to the north of

P20/68

5.3.44.1 Transfer of ownership of TOM DOWDERTY PARK
AND SOLDIER'S MEMORIAL to NEW ARLAND COAL
is not appropriate and the proponent is not
capable of Managing this asset.
The down of Acland is no longer a part
of MLA 50232 - The Reason for the
hasty & premature compensation agreement
is no longer valid:

There was no consultation about this
agreement which was ultimately done in
secret.

5.3.44.2: Noise From past experience I don't
believe any of these.

5.3.44.3: NO ONE IS LISTENING. I AM SICK
of having house rattles & swaged.
- Blast are never delayed when weather
conditions are unfavourable.
The blast zone sometimes ends up over Acland.

Have a Royal
Commission into
this matter and
many other
matters.

5.1.10 - NO MORE
HORROR

noise

P20/68

ACLAND MANAGEMENT PLAN Appendix I

Figure 1 - Acland Township

- o Central Acland : There is no need to separate any particular part of Acland.

See page 2 near top.

Section 2.3? (should read 1.3)

Section 2.4? (should read 1.4)

All of Acland is significant & should be left intact.

1.2: The AAPAC was discredited - it had no motto, no empathy for the heritage of Acland - It was designed to destroy and remove Acland.

eg. Page 160: 3.14.2 EM Plan ~~X~~

The town ship of Acland, which is now largely owned by NAC is located within the Manningvale resource area and will be closed and removed before mining commences

Photo 2 - Page 4 Acland Hall sign is missing

1.3. Acland Management strategy

Dot 2: The shop has been demolished; the former Paymaster's house and [redacted] has been demolished.

The telephone exchange is planned to be removed

"
- Reinstate Acland Hall sign"

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use telephone exchange
for School Bus Stop.

P21/68

21

5.3.44.5

Road closures - NO ONE IS LISTENING.
 PROPONENTS response is not accommodating.

~~THESE~~ SW5.3.44.6 ~~For~~

THE AUSTRAL CORNFLOWER DOES exist
 on the footprint of the MANNING VALE PIT ~~FOOTPRINT~~
ISSUE A11

ISSUES Numbered in Appendix R1. A EIS ^{SUBMISSION} ~~Appendix~~
~~ANALYSIS~~ REGISTER DO NOT CORRESPOND
 TO ISSUE NOS in script.

AUSTRAL CORNFLOWER is a State & EPBC
 listed species (VULNERABLE).

SABINE ROAD UPGRADE will need EPBC Referral

I haven't mentioned anything to do with Groundwater
 & Basalts. No Connex was made on flooding
 but if the proponent can open the Mulden Road for GB
 then they can keep it open for the Rubbish Truck
 and the mail delivery and everyone else and
 Ergo meter Reader.

ADDRESS THE
 PROBLEM:

AMEND The EPBC
 information

throughout Document
 → Prevent disturbance
 of this occurrence.

~~Referral~~ [&] ~~to be~~
 CORRECTED.

Provide Referral.

Solution -
 keep Mulden Road
 open & manage
 project accordingly.

P21/68

[REDACTED]
Balgowan
Qld. 4401.

28 September 2014

The Coordinator General
c/-EIS Project Manager: New Acland Coal Mine Stage 3
Coordinated Project Delivery
PO Box 15517
City East Qld. 4002
Phone: [REDACTED]
Email: newaclandproject@coordinatorgeneral.qld.gov.au

Dear Sir/Madam,

I am writing this submission on the Additional Information to the Environmental Impact Statement (AEIS) of the Stage 3 New Acland Coal Mine proposal. I take this opportunity to reiterate my objection to this project proposal on numerous grounds. Comments below are provided in response to NAC AEIS comments, which are, in turn, in response to my comments and suggestions made on the draft EIS. These are outlined below in Table 1.

For completeness and traceability, I have attempted to expand the original table to incorporate the subsequent response stages, as I feel it is important for the Coordinator General to gain a visual awareness of the low number of specific responses NAC have provided. As such, it is the far right-hand column that pertains to my responses to NAC's AEIS statements and responses. For ease of navigation, I have highlighted my responses to the information set out within NAC's AEIS in red text.

However, it is worth noting that tracing NAC's submission responses within the AEIS appeared quite convoluted and Appendix A1 (Submission Analysis Register) did not appear to clearly identify in which section of the AEIS NAC had responded (if at all) to my draft EIS submission issues as part of their general further information, compared to those responded to separately within section 5.3 of Chapter 5 of the AEIS.

I also provide several additional comments from my reading of the AEIS for the Coordinator General's consideration. These derive from 'new' issues encountered from reading the AEIS and, I believe, warrant further consideration by the Coordinator General. These are provided in Table 2.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] I have previously worked
as a [REDACTED]

[REDACTED] and currently [REDACTED]
Based on these qualifications, I consider myself to have an above average appreciation of the issues involved in the Stage 3 mine expansion proposal.

I confirm that the statements made below are true, to the best of my knowledge.

[REDACTED]
[REDACTED]
[REDACTED]

Thank you for considering the issues I have raised in this submission. I hope that the correct decision is made.

Yours Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

amounts to an approximate total of 2.16 Mt CO₂-e. This is equivalent to approximately 1.6% of Queensland entire greenhouse gas emissions.

NAC state that the operation of the Phase 3 project would increase GHG emissions by 0.055 Mt CO₂-e on existing GHG emissions. However, this is an unfair and inappropriate comparison since the Acland Mine operations would otherwise be completing in 2017 and GHG emissions would be zero.

NAC to amend this sentence to accurately account for the otherwise closing of the mine and resultant reduction in GHG emissions from the mine site.

Comment noted.

However, no working out is demonstrated so it is unclear whether it is accurate.

No further comment provided by NAC.

5 11-21

NAC state that the Department of Environment and Heritage Protection (DEHP) "...has acknowledged that a PNL [planning noise level] of 28 dB(A) is an inappropriate level for practical compliance purposes." As such, NAC have not considered this in their noise assessment.

Despite it being a government guideline that major projects (and internal DEHP guidelines) still refer to, the absence of this document online limits the ability of any member of the public to read and scrutinise the guideline. Nevertheless, the intent of the Planning for Noise Control Guidelines appears largely twofold; this being to:

- Protect sensitive receptors for unreasonable noise levels from new developments
- Protect general amenity from cumulative noise creep

There are two solutions proposed for this item:

- NAC's Stage 3 EIS application be refused; and
- NAC provide further evident/detail from DEHP directly about why the Planning for Noise Control Guideline is deemed unobtainable and should be omitted from this project assessment.

Comment noted.

No further comment provided by NAC.

The key point here is that DEHP should not be referring to a guideline and holding it up as a standard in publicly available information if that same guideline is being by-passed when it suits the proponents and government agencies. Presumably, the Planning for Noise Control Guidelines were developed with such mining developments in mind, and the methodology it employs (and the resultant noise levels it generates) *is* pertinent to *all* developments. If there is a suggestion that this guideline is not applicable, then there are existing legislative processes that enable these to be amended.

Also, an alleged "acknowledgement" by DEHP without any supporting reasoning is simply not good enough for NAC to discard the use and application of this key government guideline.

5 11-20

NAC admit that despite implementation of mitigation measures, "...the predicted noise levels from the mining operation will still exceed the *Planning for Noise Control Guideline's* PNL at a number of noise sensitive receptors."

NAC's Stage 3 EIS application be refused.

Comment noted.

No further comment provided by NAC although some further information is provided within section 5.1.

data regarding health impacts on coal mine workers, there are an increasing amount of data that points towards chronic adverse health impacts on communities surrounding coal mines. For example, a University of Sydney review in 2012 focussed on international and local evidence for health and social impacts on local communities by coal mining (Colagiuri *et al.*, 2012). Results cited "clear indications from international health research literature that there are serious health and social harms associated with coal mining, with local communities to coal mines exhibiting higher mortality rates, higher rates of cardiopulmonary disease, hypertension, kidney disease, asthma and a reduced quality of life. Further detailed information can be found at:

http://sydney.edu.au/medicine/research/units/boden/PDF_Mining_Report_FINAL_October_2012.pdf

Other additional objective works are readily available for NAC to review, should they wish to.

communities surrounding coal mining and coal-fired power stations to objectively discuss this subject in the context of their proposed project, rather than rely on a single 15 year likely outdated study in a seemingly dismissive manner.

the author discovered "clear indications from international health research literature that there are serious health and social harms associated with coal mining, with local communities to coal mines exhibiting higher mortality rates, higher rates of cardiopulmonary disease, hypertension, kidney disease, asthma and a reduced quality of life."

While I understand NAC's use of conversations with two Oakey-based medical personnel to support of there being no empirical increase in mine-sourced medical conditions (it is obviously necessary to use empirical evidence where possible), it still needs to be recognised that NAC's absolute refutation of the mines impacts on health based on this limited data (in quantity and scope) appears flawed,. For example, the subjectivity of medical professionals note-taking alone renders this approach statistically dubious, without exploring other assumptions made.

.5 9-60

NAC state that "...current assessment procedures using dispersion modelling, local meteorological data and NPI emission estimation techniques can provide some confidence that predictions are accurate to within a factor of two."

Accuracy to within a factor of two, in cases such as this where a large number of sensitive receptors are predicted to be regularly close to statutory air quality maximums, is simply not good enough. If the inherent error in NAC's predictive approach for air quality is known and understood to be this significant, this should be reflected in the maximum predictive air quality levels for surrounding sensitive receptors after NAC's "adaptive management" measures are in place (i.e. with a breach of air quality objectives >50, and known model accuracy being two-fold, the maximum predictive air quality level should not be greater than 25).

The EIS provides a greenhouse gas (GHG) inventory for scopes 1, 2 and 3. While polluting industries are only required by law to report to NGERS on scopes 1 and 2 at this stage of the polluter, there is a moral responsibility to consider scope 3 emissions in the decision over whether the Stage 3 mine expansion should occur.

NAC state that the mine will produce approximately 0.18 Mt CO₂-e in GHG annually for the life of the mine. This

NAC amend maximum air quality levels to account for apparently significant inaccuracies, and that these be enforceable within the respective EA.

NAC to adopt a socially responsible approach and include Scope 3 GHG emissions within their assessment and mitigation measures committed to.

NAC's Stage 3 EIS application is refused.

Comment noted.

Comment noted.

Comment noted.

No further comment provided by NAC.

No further comment provided by NAC.

No further comment provided by NAC although NAC do dispute this % total in various parts of the AEIS.

.1	6-62 and 6-68	There is an apparent break in the text between page 6-62 and 6-68.	complaints of decreasing bore yield that appears linked to mine operations, and to 'make good' any bores that are impacted. NAC to rectify mistake in text so that it reads correctly.	Comment noted.	No amendment evident by NAC.
.1	6-62; 6-68 and Figure 6-31	NAC illustrate fairly significant reductions in streamflow from Oakey Creek and Myall Creek. NAC state that they do not have streamflow gauging data for Myall Creek and so it is unclear how NAC have calculated their projected impacts on Myall Creek.	NAC to elucidate how projected impacts on Myall Creek were calculated, given the apparent absence of empirical data.	Comment noted.	No response evident by NAC.
.1	6-62; 6-68 and Figure 6-31	NAC illustrate fairly significant reductions in streamflow from Oakey Creek and Myall Creek. The Oakey Creek streamflow data used is from approximately 37km west of the project site. It is very feasible that a difference of 37km between sites could translate into a considerable difference in flow regimes, which brings doubt in the accuracy of this data used by NAC.	NAC to explain how representative the Oakey Creek streamflow data is, and potential 'feedback' or 'knock-on' effects in any subsequent modelling based on any inaccuracies in this data and any flawed assumptions.	Comment noted.	No response evident by NAC.
.1	6-62; 6-68 and Figure 6-31	NAC illustrate fairly significant reductions in streamflow from Oakey Creek and Myall Creek. While NAC provide maximum projected daily losses to the stream flow in these creeks, it should be noted that the use of daily averages in this way is unlikely to fully reflect the asymmetry of the streamflow system. As ephemeral creeks, the streamflow may be very seasonal and so averaging out the data in this way may not be a very accurate way of projecting and understanding such impacts.	NAC to provide streamflow data a form that accounts for the ephemeral nature of the creek streamflows.	Comment noted.	No clarity on the matter evident by NAC.
.1	6-69	<p>Under the sub-heading of "Effects on Groundwater Levels Post Mining" NAC state that "...groundwater levels are predicted to gradually recover so that for the most part there is less than 5 m residual drawdown outside the revised Project's boundary as depicted in Figure 6-33 and Figure 6-34."</p> <p>However, when comparing these two figures with Figures 6-22 to 6-28 it is clear that there is very little change in the groundwater impact even 100 years after mining operations have stopped.</p> <p>Worryingly, this appears particularly the case for private landholders outside the NAC boundary. To provide the excuse that the land reaches a post-mining "...new steady-state equilibrium..." offers little comfort. Rather, it</p>	<p>NAC to appropriately acknowledge the extent and longevity of the impact upon groundwater in the local area and upon local users.</p> <p>5.3.22.4 Issue 4</p> <p>Updated groundwater modelling, including a sensitivity and uncertainty analysis, has been undertaken for the revised Project since the public release of the draft EIS and is reported in the IESC Submission presented in Appendix F, H and N of the AEIS. The updated model has further refined the groundwater impact predictions presented in the draft EIS. The groundwater modelling undertaken in the draft EIS and the subsequent AEIS has included a revision to the assessment of likely impacts post-mining.</p> <p>Importantly, NAC has committed to 'Make Good' measures for affected landholders as outlined in the draft EIS and the revised Project's GMIMP located in Appendix H of the AEIS (i.e. as an update version). As outlined in the GMIMP, and to ensure consistency with the Water Act, a complaints process for affected landholders will be set up, and NAC will follow this process to investigate and confirm groundwater</p>	<p>In addition to NAC's commitment toward making good on any groundwater impacts upon nearby private landowner water bores, NAC should additionally undertake appropriate baseline assessments on all likely and potentially affected water bores prior to any extension of the mine (should the proposed project be approved).</p> <p>These baseline assessments should be undertaken in accordance with the requirements set out in DEHP's Baseline Assessment Guideline.</p>	

just confirms that the impacts of this transient operation on groundwater are of much greater extent and duration than should be allowed.

impacts following a complaint. Should these investigations confirm the complaint, NAC will reach agreement with affected landholders for 'Make Good' measures.

In addition to the complaints process, NAC has already commenced the process of putting Landholder Agreements in place for those landholders that have been identified as having bores that may be impacted by the revised Project. NAC is committed to ensuring that its neighbours with the potential for groundwater impacts from the revised Project possess a legally binding process to investigate groundwater complaints, and as required, to rectify identified groundwater issues through 'Make Good' measures.

For additional information regarding this matter, please refer to **Section 5.1.9** and **Section 5.1.10** of the AEIS.

.1	6-72	<p>NAC estimate the evaporation from the final voids as being up to 2.4 Gigalitres/year (or 2.4 Billion litres), with the final void area of approximately 1.6km² (or 160 ha) below the water table. In comparison, NAC's Stage 2 EIS estimated an evaporation loss of approximately 349ML/yr based on a lake evaporation factor of 0.7 with a final void area of 50ha. Using the same formula, one would expect an evaporation loss of approximately 1.1 GL/yr, which is roughly half what NAC are now proposing. It is understood that NAC have adopted BOM information for the Stage 3 calculation but it is not clear why (a) NAC appeared to use other data in the Stage 2 EIS, and (b) why they made the change towards the BOM information to generate these projections.</p>	<p>NAC to address differences in the evaporation rates stated for Stage 2 and 3 in their respective EIS documents.</p>	<p>Comment noted.</p>	<p>It is worth noting that NAC has made significant reductions (over. 50%) in the projected evaporation rates for the final voids, which (alongside some minor amendments to the groundwater model methodology) has resulted in significantly changes in the depths of the final voids and conclusions regarding long-term salinity.</p> <p>While NAC defend this significant change in their modelling methodology, it is worth noting that the original evaporation rates were based on local empirical; evidence that is consistent by local farmers understanding.</p> <p>It is therefore unclear why, given the significant differences in the two BOM datasets (both published in 2011) for evaporation, NAC failed to utilise the now-preferred dataset in the first place. While other enhancements to the groundwater model appear based on additional data, the switching over the BOM datasets makes little logical sense.</p>
.1	6-72	<p>NAC estimate that water inflow during and after mining will peak at nearly 1.5 Gigalitres/year and 1.3 Gigalitres/year respectively. A significant portion of these losses will comprise groundwater losses, which is supported by the following statements by NAC in Chapter 4 of the EEIS (page 4-66):</p> <p>"Diversion bunds will be strategically constructed around each depressed landform to prevent the ingress of surface water from either overland flow during significant rainfall events or flooding within the Lagoon Creek floodplain."</p> <p>There are several points to be made around this figures stated:</p>	<p>Two suggestions are suggested:</p> <ul style="list-style-type: none">• NAC not be given project approval for the proposed Stage 3 mining operations• NAC be made to address the long-term water loss impacts of their operations, beyond a simple statement (as	<p>Comment noted.</p>	<p>Whilst NAC have drastically altered evaporation data in amending final forms of the lake voids, the sheer volume of ongoing groundwater loss remains staggering.</p>

Manning Vale East pit in order to meet noise objectives (dependent on ambient conditions). This statement is of real interest to my family since we reside approximately 2km from the mine currently, and have regularly needed to raise complaints (to both NAC and EHP).

Results of EHP noise investigation at our house identified that NAC had breached their maximum noise levels allowed whilst NAC's monthly monitoring (to our limited knowledge) has not shown a breach but always appears to coincide with anomalously low operational at activities (and therefore anomalously low noise).

Upon questioning NAC and EHP about this apparent pattern, both parties have informed us that it would be unfeasible that NAC could vary their operations in this way. Yet NAC now appear to be making a statement to the contrary, which raises the question of whether this has previously been feasible, and if so, why has this not been communicated accurately to us (and EHP) or acted upon in order to reduce noise impact on my family.

enforce/audit the implementation of 'best practice operations' and evaluate the efficacy of the noise mitigation system (comprising real time noise monitoring, meteorological assessment and resultant changes in NAC mining operations). As element of this evaluation must include feedback from sensitive receptors and be assessed by an independent third party auditor annually.

been provided by NAC.

Given what appears a marginal confidence in NAC's ability to meet the relevant objectives and implement the noise mitigation system, alongside the suggested out-sourcing of the system auditing to a third party, I still believe such a change to EA conditions would be consistent with the intent and current regulatory direction of the administering authority.

.1 2-26

In response to the ecologically sustainable development (ESD) objective "To enhance individual and community well-being and welfare by following a path of economic development that safeguards the welfare of future generations." NAC's response, even the sub-section title of "Individual and Community Well-being and Welfare" has an unbalanced focus on short-term economic outcomes and fails to address the key component of "...that safeguards the welfare of future generations." This is predictable given the following:

- As part of previous mine expansions, NAS has bought out (and effectively destroyed) a tight-knit multi-generational community in Acland Township.
- Areas of land that are suitable for cropping now or in the future will be rendered sterile (apart from likely poor quality grazing land). Given the increasing population and pressures on increasing cropping yields in the future (a key focus for the current LNP government) this could be a significant impact on future generational welfare.

NAC to broaden their focus to ALL aspects of the ESD principles and not just elements that their project can link to. In particular, NAC should comment on how their proposed project "...safeguards the welfare of future generations."

5.3.22.2 Issue 2

NAC disagrees with the Private Submitter's views about the revised Project in relation to ecological sustainable development. NAC believes that the Mine has provided social and economic benefits to the region and for the revised Project expects these benefits to further increase as described in Chapters 2, 16 and 17 of the draft EIS.

In regard to the Private Submitter's comment about the land acquisition within Acland, the majority of landholders originally approached NAC for the sale of their properties to take advantage of a better financial outcome and the opportunity to advance their lifestyle aspirations. Some of these former landholders have remained in the local area. While other former landholders have moved further afield in pursuit of their opportunities. Furthermore, on analysis of the facts, NAC believes that Acland was suffering the fate experienced by many small rural towns and was in a phase of senescence as a result of:

- an aging population;
- a general migration of younger people to cities and larger rural centres in search of employment and other opportunities;
- a lack of basic facilities; and
- its geographical location in relation to larger rural centres which offer a greater degree and diversity of services and facilities (e.g. Oakey and Toowoomba).

Therefore, NAC believes it has not destroyed the local community, but rather has facilitated the inevitable evolution of the local community as it adapts to the influences of a society progressing further into the 21st Century. Importantly, NAC as a major landowner is committed to a sustainable future for Acland and has provided an AMP in Appendix I of

While I understand the ESD principles should be viewed as a package, NAC's response fails to convince on this matter. In addition to my previous statements, in response to NAC's subsequent response, I will add that:

- It is only right that NAC's measures to mitigate its environmental harm, such as the APC and use of TRC's Watella water, should be consistent with the ESD's "polluter pays" principle, i.e. those who generate pollution and waste should bear the cost of containment, avoidance or abatement. However, NAC's views still appear to betray a very short-sighted approach that results in the long-term ESD principles being compromised to allow short-term financial gain. Importantly, NAC's reduction of the viable agricultural capacity of the impacted land will stretch over thousands of years. Given future concerns regarding climate change, it is likely that cropping land will be far more sensitive to such changes than grazing land. Considering the increased demand for agricultural production over the coming decades, and sensitivity to extraneous parameters such as climate change, it still doesn't appear to make much long-term sense.

the AEIS.

NAC acknowledges the importance of agricultural land, and as a result, the NHG formed the APC during 2006 to manage land acquired for the revised Project ahead and behind the active mine path. The APC also provides expertise in relation to NAC's rehabilitation activities, grazing management and weed and pest management.

NAC and the APC are committed to improving rehabilitation performance over the life of the revised Project and are continuing grazing trials and a rehabilitation monitoring program to further promote this commitment. This objective is supported by the economic benefits of returning rehabilitated mined land to the highest possible level of agricultural production. Good rehabilitation performance at the revised Project site is critical to the maintenance of NAC's "social licence to operate" on the Darling Downs. The synergies of NAC's and APC's businesses demonstrate a commitment to achieve a long term sustainable outcome that provides social and economic benefits to the local community both now and into the future.

Furthermore, as a result the NHG's sustainability vision and holistic approach to land management within the Acland district, the APC will continue to manage the post mined and surrounding land as an agricultural enterprise into the future, which will secure on-going farm based employment and agricultural production at the cessation of mining in the Acland district. The APC as a larger farming business in the Acland district will also possess the advantage of 'economies of scale' through the amalgamation of smaller farm blocks that were no longer economically viable on an individual basis and were potentially being managed in a detrimental manner as a result of income pressures to meet the daily cost of living. This trend in the growth of farm size to increase profitability is consistent with current trends within the agricultural sector (Hooper et. al. 2002) and will become a significant factor for the agricultural sector with the continued push to improve Australia's agricultural production into the future and as small family-owned and managed farms continue to struggle within the current economic circumstances (e.g. poor commodity prices and increasing farm costs).

NAC's beneficial re-use of recycled water from the WWRF over the life of the revised Project is providing the TRC with a significant revenue stream that will deliver a continued benefit to the local regional community both now via improved council service delivery and into the future through the construction of community infrastructure.

Therefore, NAC believes the revised Project supports the principles of ecologically sustainable development and will ensure intergenerational equity is not negatively compromised. The revised Project will deliver both short and long term social and economic benefits. Further discussion around this matter is provided in **Chapter 2** of the draft EIS. For additional information regarding this matter, please refer to **Section 5.1.9** and **Section 5.1.10** of the AEIS.

- Given the current stressed financial condition of the coal industry, the financial case for the proposed Stage 3 development appears shaky at best. Since it's clear that the project holds a long-term negative impact on the environment, very debatable short-term and long-term social advantages, and (in the current financial environment) negligible financial advantages, I'm really left uncertain how this project justifies the compromising of short-term ESD principles.

As an aside, it's probably not too appropriate to utilise a 12 year old study to stress a point regarding current trends in agriculture.

[REDACTED]

From: [REDACTED]
Sent: Thursday, 9 October 2014 8:36 AM
To: [REDACTED]@newhopegroup.com.au); [REDACTED]
[REDACTED]@newhopegroup.com.au)
Cc: newaclandproject@coordinatorgeneral.qld.gov.au
Subject: Part 2: Information request: issues raised in AEIS submissions; CGER requirements
Attachments: [REDACTED] Response to NAC Additional Information.pdf; Submission on the New
Acland Coal Mine Stage 3 project signed.docx; FW: Social Impacts -New Acland Stage 3;
FINAL_Stage 3_AEIS_ [REDACTED].pdf

Further to previous – regards

[REDACTED]
(

[REDACTED]
Project Manager
Coordinated Project Delivery
Office of the Coordinator-General
Queensland Government
tel [REDACTED]
post PO Box 15517 City East Qld 4002
visit Level 4, 63 George Street, Brisbane
[REDACTED]@coordinatorgeneral.qld.gov.au

Customers first Ideas into action Unleash potential Be courageous Empower people

(

[REDACTED]

From: [REDACTED]
Sent: Thursday, 9 October 2014 9:09 AM
To: [REDACTED]@newhopegroup.com.au); [REDACTED]
[REDACTED]@newhopegroup.com.au)
Cc: newaucklandproject@coordinatorgeneral.qld.gov.au
Subject: TRIM: FW: Information request: issues raised in AEIS submissions; CGER requirements
Attachments: [REDACTED] aeis-submission-fact-sheet-and-form-new-acland.docx; ExpertNoise Report_New Hope Coal EIS_ARB.pdf; submission on additional EIS information

HP TRIM Record Number: E14/279550

Another re-send – I will send [REDACTED] submission separately.

From: [REDACTED]
Sent: Thursday, 9 October 2014 8:35 AM
To: [REDACTED]@newhopegroup.com.au); [REDACTED]
[REDACTED]@newhopegroup.com.au)
Cc: newaucklandproject@coordinatorgeneral.qld.gov.au
Subject: FW: Information request: issues raised in AEIS submissions; CGER requirements

Good morning All – a re-send to accommodate file size – I will send Part 2 of the attachments separately.

Regards

[REDACTED]

From: [REDACTED]
Sent: Wednesday, 8 October 2014 6:17 PM
To: [REDACTED]@newhopegroup.com.au); [REDACTED]
[REDACTED]@newhopegroup.com.au)
Cc: newaucklandproject@coordinatorgeneral.qld.gov.au; [REDACTED]
[REDACTED]@coordinatorgeneral.qld.gov.au)
Subject: Information request: issues raised in AEIS submissions; CGER requirements

[REDACTED]

As discussed [REDACTED] and I have reviewed AEIS submissions and request the following information be provided to inform development of the CGER:

1. Provide a high resolution copy of figure 3-4 (EIS Appendix 20: MNES)
2. What is the total amount of vegetation to be cleared for the project (excluding REs/TECs)
3. Further to ADP email dated 29/8/14 5:23Pm re landholders likely to be impacted by groundwater drawdown: please clarify a) the total number of bores potentially impacted in the maximum extent, including NHG owned bores b) how many landholders own the bores – and of this, how many bores NHG owns
4. For the OCAA submission – please note all comments.
5. From the submission, a response is sought on the following items:
 - pages 29, 30: mine water usage, including TRC WWTP supply figures vs. EIS data; and respond to comment regarding preferential use of bore water

- page 30: comment regarding Oakey waste water use and potential hazards of its use. Additionally - how is the brine used on-site; and what quantities are likely to be sourced for the project?
6. Response to attached pdf 'Expert Noise Report [etc]' section 4.2
 7. Note comments in attached email 'submission on additional EIS information' by [REDACTED]
 8. From the submission, please respond to:
 - Page 13 – monitoring at [REDACTED]
 - Pg 14 – proximity to above [REDACTED]
 9. State why purchase of the Tom Doherty Park is still sought given it has been excised from the MLA. Has NHG sought confirmation on if the purchase is still able to be achieved?
 10. Provide information on the company's feedlot development and consider the feedlot in the context of EIS chapter 20: cumulative impacts
 11. Note comments in attached submission from [REDACTED]: pdf [REDACTED] [etc]' See following email, including Acland maintenance and management suggestions.
 12. From the submission, respond to:
 - Page 11 re EMP section 3:14:2
 - Page 20 re 5.3.44.3. re blasting fume events – when was the last event? How frequently have these occurred in recent years?
 13. Note comments in submission from [REDACTED] – pdf 'FINAL Stage 3 AEIS [REDACTED] [etc]' See my email sent today 8:36am
 14. From the submission, respond to:
 - Page 8 - comment regarding age of study that informed discussion on agricultural trends
 - Pg 12 – choice of BOM dataset re evaporation
 - Pg 33-34 – assumptions used for GGEs – noted section 10.4.2 of the EIS does not specifically address assumptions

SIA considerations

15. [See attached email 'FW: Social Impacts – New Acland stage 3' See my email sent today 8:36am emailed to you last week – noted you said today this was being worked on; included here for completeness]
16. **COMMENTS ON CONSULTATION AND ENGAGEMENT**
 Given the number of issues raised here which relate to the consultation, engagement, negotiation and information provision which are critical of the processes and procedures adopted by NAC during their current operations and throughout the EIS Process for stage 3, the CG should be informed about when the improved communication and engagement strategies will be implemented and what these process will look like for residents that will be different to current practice. Also how will they be informed about the improved approach specifically rather than simply state "at this has happened as part of the public notification of the AEIS.
17. My view would be that best practice communication means- as a key business strategy you inform and explain to your audience your range of communication strategies how these will be delivered, the frequency of delivery and the range of information that will be provided(Mitigation and Management commitments) - you then implement the strategies ensuring you deliver the promised communication strategies and also deliver on the outcomes you commit to as a result of communication. JRLF may be good example of where NAC has failed, in this regard (subject to the response from NAC on increased Mpta
18. If NHG specifically provided information as suggested above (perhaps in a newsletter which was solely focussed on Communication and Engagement) to residents this would also need to reference process and procedures for the following:
 - Acland Management Plan
 - Acland Colliery Conservation Plan
 - Air Quality - Dust- Blasting - Vibration
 - Water Resources
 - Noise
 - Complaints and Dispute Resolution process
 - JRLF Monitoring of Operation and Decommissioning - [REDACTED] refer to increased ralling volumes
 - Community Reference Group Process
 - Road Closures

- Opportunities for Community Involvement and process related to this
- Land holder agreement process.
- Health Impacts

19. A key section of the community do not see NAC as a good corporate neighbour and NAC need to work harder to demonstrate their credibility, trust and strengthen their social licence to operate.

20. WORKFORCE NUMBERS

Given continued downturn in the mining industry and associated job losses should we seek clarification from NAC there current and predicted workforce numbers if this expansion proceeds. An up to date position would be useful when writing workforce management section of Social Chapter and would enable us to ensure we have the latest information from NAC even if this has not changed.

A number of AEIS submitters has raised the question of validity of EIS job numbers given recent shift reductions and trialling of new equipment (e.g. Wirtgen) that may result in further job losses. Please respond to page 2 'economic benefits' of attached Word document: Submission on the New Acland Coal Mine [etc].docx – submission from [REDACTED] See my email sent today 8:36am

21. COMMENTS ON COMMUNITY ENGAGEMENT ACTION PLAN

Community Reference Group

22. NAC state on their website that the Community Reference Group "was established through a transparent and equitable process to select representatives from across the region as foundation members". It would be good if NAC could provide us with details of the process adopted for the establishment of this group and the appointment of any future members. In addition to this they reference a CRG Charter (which details roles) for the group in the EIS consultation Chapter. I suggest that we request a copy of this.

This information will help us understanding process, operation and roles.

23. Community Complaint and Dispute Resolution Mechanism

Suggest the issue raised by [REDACTED] (BOTTOM OF PAGE 18) are clarified by NAC

24. See attached pdf submission [REDACTED] [etc] See my email sent today 8:36am – respond to statement that TOR requirements regarding investigation of mental health context and impacts has not been addressed

[Following relates to 'Project Memorandum No. 2_ Version 2' issued by NHG 2/10/14. For where [REDACTED] has noted response, nothing further is needed]

25. 7.1 Road Closures

j. Issues 1-5 and 8-10

Further to your reply to the issues raised in relation to road closures these are noted. However they are not considered to be sufficient to deal with the mitigation and management of the direct impacts that will affect residents as result of these closures. It is acknowledged that the Acland / Sabine Road provides a partial mitigation for residents but does not allow them to continue to access utilise and enjoy the region fully (as they currently are able to do) without experiencing additional specific impacts detailed ion my email of the 25 September as a direct result of the stage 3 expansion.. Given the requirement of the Terms of Reference to provide strategies as part of the EIS process that mitigate and manage direct impacts, advice will now be sought from the Coordinator General in regard to if there is the requirement to condition suitable outcomes to enable the resolution of the road closure impacts for residents.

27. Issue 6

Thanks for clarifying that Acland /Sabine Road will be fully sealed.

28. Issue 7

Given NAC response and their commitment to seal the Acland/Sabine can an additional commitment please be include in the commitment register that states " that the upgrade works along the Acland / Sabine Road will be undertaken before any road closures to ensure access to Acland township is maintained at all times"

29. 7.2 Community Reference Group/Community Information Sessions/ Community Newsletters

30. Issues 2a-2c

Noted and Minutes reviewed

31. Issue 2d

I take from your response that there has not been any specific group or individual information session in regard to the enhanced consultation and engagement process and practices or the specific issue raised by submitters between the closure of the public information period for the EIS and the public information period for the AEIS.

32. Can you tell me the extended operating hours of the NHG Community Information Centre and also the proposed dates for the forthcoming information sessions referred to in your response to assist me with drafting the CG Report.

33. Issue 2e

Noted

34. 7.3 Jondaryan Rail Load Out Facility

Noted – will come back to you if any further clarification required

35. 7.4 Acland War Memorial – Tom Doherty Park

Noted

With thanks

[Redacted]

[Redacted]

Project Manager

Coordinated Project Delivery

Office of the Coordinator-General

Queensland Government

tel [Redacted]

post PO Box 15517 City East Qld 4002

visit Level 4, 63 George Street, Brisbane

[Redacted] [@coordinatorgeneral.qld.gov.au](mailto:[Redacted]@coordinatorgeneral.qld.gov.au)

Customers first Ideas into action Unleash potential Be courageous Empower people

Submission on the environmental impact statement— New Acland Coal Mine Stage 3 project

Describe the issue	Suggested solution
<p>The AEIS does not address our concerns.</p> <p>There is no escaping the fact that the proposal results in the destruction of Strategic Cropping Lands that will never again be suitable for the growing of crops. Despite the proponent's protestations, the language used in the original EIS sought to downplay the extent of impact on SCL. We re-cite the examples provided in our previous submission: Reference is variously made to "situated on predominately grazing land"; "subject to long periods of continued dry years"; and that it is "moderate to good quality grazing land" that is "part of a substantial resource".</p> <ul style="list-style-type: none"> • The historical land use is not "predominately grazing" • This land has been cropped for generations. • It is top quality soil and will be decimated forever more for this type of land use in preference for a mining return for less than 15 years (the proverbial blink of an eye) • No reason why this farming land could not continue to be cropped indefinitely. Such use would continue to offer employment for generations to come; offering something beyond the tiny time period of 15 years; keeping people in the community; providing an ongoing economic benefit to future generations (<u>not just the current</u>); positioning Qld to feed the growing world population and the burgeoning Asian middle class. 	
<p>Economic benefits</p> <ul style="list-style-type: none"> • Since publishing of the EIS in January 2014, NAC has reduced shifts of employees • The world coal market is depressed and there is no guarantee that it won't get worse in the future and remain so for an extended period of time (New Scientist magazine reports that China "the world's largest consumer of coal has announced radical restrictions on the importing and use of the stuff" Sept 20 2014 page 7). • Since EIS published in January 2014, NAC has announced a four month trial of a "surface miner" machine which automates much of the mining process. In an article in "Australian Mining" on 26 June 2014, New Acland General Manager [REDACTED] was quoted as saying "it can cut the coal, load the coal and trim the floor all in its own working space. It doesn't need to be supported by dozers or a number of other pieces of equipment". <p>Are the employment benefits trumpeted by the proponent over-stated in light of the possible implementation of this and future mechanisation? Surely, in a depressed market, any miner will be looking to minimise costs – especially high labour costs typical of mining enterprises.</p>	
<p>5.1.11 of the AEIS</p> <p>Opportunity cost is indefinite as the land change is <u>permanent</u>. It is <u>not just the life of the project</u>.</p> <p>We take exception to the proponent's statement in 5.3.30.2 issue 2 that we had made "assertions that the revised project will cause the closure of local businesses in Oakey". We did no such thing. Our submission to the EIS made the simple point that – for all the claims by the proponent of major economic benefit to the local communities – there is nothing to show for it, to-date, in Oakey. Our initial point is vindicated in the response of the proponents with the acknowledgement in paragraph 2 of 5.3.30.2 issue 2 of the fact of Oakey business closures and the attempt to attribute this to changing demographics. Clearly, the mine has been no saviour for Oakey.</p>	

Submissions close at 5pm on 29 September 2014

Name:	[REDACTED]	Email:	[REDACTED]@gmail.com
Organisation (if applicable):		Telephone:	[REDACTED]
Address:	[REDACTED]		

Describe the issue	Suggested solution
<p>The proponent has made much of its desire and need to obtain a "social licence" for the proposed project. The key truth in the statement of this goal by the proponent is an implicit admission that they don't currently have this "social licence". As one would expect, the proponent's original EIS and the new AEIS are high on self-praise and the proponent's perceived positive outcomes arising should the proposal be approved. However, the demonstrated history is one where locals have been treated with contempt – in particular, the farmers and landowners of Acland, Muldu and the surrounding district and the residents of Jondaryan who have been subjected to unacceptable levels of coal dust from the rail loading facility [If it wants that "social licence, perhaps the company's Chief Operating Officer should think twice about the content of the letters he writes to the press: ██████ missive published in Toowoomba's The Chronicle on 14 August 2014 was an example of the contempt that the company holds for those affected by its operations. Apparently, everything is OK in Jondaryan because some numbers meet some Government guidelines. I wonder if he, and other, New Hope executives would feel the same if it was them and their families living in the dust blown over the town from the prevailing easterly winds?]</p> <p>A good corporate citizen – the one so effusively presented in the EIS and AEIS documentation – would already have the overwhelming support of those most closely affected. It would not need to now obtain that "social licence" – it would already have earned it.</p>	<p>The proposal should not be approved.</p> <ul style="list-style-type: none"> • The destruction of a finite, irreplaceable resource in good quality soil is unconscionable. No "social licence" can ever be obtained for such an outcome. • The government should be held to its promise that no strategic cropping land would be dug up for mining. The proponent outlines a proposal to do just that. It's time for the Government and its agencies to turn the promise into action and reject this proposal.
<p>The current government went to the 2012 Queensland State Election promising that, if elected, Stage 3 of the Acland mine would not proceed. In her press release of 19 February 2012, the now-member for the electorate of Nanango, ██████, said that the LNP <u>would not support</u> the proposal for Acland stage 3 that <u>would see the expansion of the open cut coal mine digging up strategic cropping land</u>. "Only the LNP will stand up for locals and protect our very best farming land that can sustainably produce food and fibre for future generations. We will protect farm communities from being dug up for mining", she said.</p>	<p><u>Mining should not be permitted on strategic cropping land.</u></p>

10. Provide information on the company's feedlot development and consider the feedlot in the context of EIS chapter 20: cumulative impacts
11. Note comments in attached submission from [REDACTED]: pdf [REDACTED] [etc]', including Acland maintenance and management suggestions.
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Sent: Thursday, 9 October 2014 8:35 AM
To: [REDACTED]@newhopegroup.com.au); [REDACTED]
[REDACTED]@newhopegroup.com.au)
Cc: newaclangproject@coordinatorgeneral.qld.gov.au
Subject: FW: Information request: issues raised in AEIS submissions; CGER requirements
Attachments: [REDACTED] aeis-submission-fact-sheet-and-form-new-aclang.docx; ExpertNoise Report_New Hope Coal EIS_ARB.pdf; submission on additional EIS information; [REDACTED] 1812 New Aclang AEIS - [REDACTED] - [REDACTED].pdf

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[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]@bournet.com.au

26 September 2014

The Coordinator-General
C/- EIS Project Manager – New Acland Coal Mine Stage 3 Project
Coordinated Project Delivery
PO Box 15517
CITY EAST QLD 4002 Australia
Email: newaclandproject@coordinatorgeneral.qld.gov.au

Dear Coordinator-General,

Re: Comments on NAC's Additional Information provided in Response to Submissions on the Draft Environmental Impact Statement (EIS) — New Acland Coal Mine Stage 3 Project

Thank you for your invitation, dated 28 August 2014, to comment on the additional information provided by NAC in response to issues raised in submissions received on the EIS.

I note my earlier submission to you, dated 2 March 2014, regarding the NAC Draft Environmental Impact Statement. The following comments supplement my earlier submission, which is attached to this document as Appendix A, and the current document should be read in conjunction with the earlier submission.

Section 1.11.2 of the original NAC Draft EIS stated that, "The objective of the impact assessment process is to ensure that all impacts, direct and indirect, particularly environmental, social and economic impacts are fully examined and addressed."

I note that Section 6.1.3 of the Terms of Reference required that the EIS undertake a "targeted baseline study of the people residing in the project social and cultural area, to identify the projects social issues, potential adverse and positive social impacts, and strategies and measures developed to address the impacts. The social baseline study should be based on qualitative, quantitative, and participatory methods."

[In my submission dated 2 March 2014, I provided a detailed analysis indicating that the original EIS had not adequately examined or addressed extant or potential mental health and social impacts on local people potentially affected by the proposed development.

Further, I argued that the EIS failed to adequately examine or address potential social and mental health impacts due to its reliance upon very limited anecdotal evidence to support conclusions and recommendations. It was clear that the authors of the EIS had not undertaken the "targeted baseline study" based on "qualitative, quantitative, and participatory methods", as required by the Terms of Reference, which are essential for the proper assessment of social impacts.

I refer the reader to my appended 2 March 2014 submission for further details of the inadequacy of the original EIS.

NAC's Additional Information Provided in Response to EIS Submissions

Section 5.1.8.2 of NAC's "Additional Information" noted that:

"Issues relevant to health that were raised by Private Submitters included: a belief that the revised Project will lead to unacceptable health impacts for sensitive receptors, Jondaryan residents and surrounding areas due to coal dust from revised Project; noise from revised Project will be disruptive at night and harmful to health (e.g. through sleep disturbance); and the revised Project will cause impacts on mental health as a result of noise, stress, anxiety or solastalgia, and mental health in the local area was affected by the acquisition of land by APC."

In response to these concerns, "NAC consulted with the Manager of the Cherry Street Medical Centre and Oakey Hospital Superintendent (the Manager) and the Oakey Hospital Director of Nursing (DON), to discuss the local health status and any health impacts from existing mining activities in the area."

On the basis of information obtained at these meetings, the authors of the NAC Additional Information document concluded:

"On the evidence of the health providers consulted, the Oakey Hospital catchment does not have a higher than average prevalence of mental health issues beyond what would be expected in an ageing community with areas of low socio-economic status. Incidences of depression related to drought have been seen in the region, and youth suicide has been an issue of concern. Neither the Manager nor the DON were aware of any incidences of depression or mental illness relating to Acland or changes to the area."

"Similarly, there were no elevated levels of affective disorders such as depression or mental health issues in the region. However, the Manager had spoken with patients from the Oakey area who were anxious about the potential for the Mine to encroach upon Oakey. The Manager also noted that some local residents were concerned or anxious about changes to the local area, however these concerns did not present as requiring a mental health or other diagnosis."

The NAC authors also briefly discussed research indicating elevated levels of depression in areas of drought and, in some more detail, discussed the impacts known as "solastalgia" noting that solastalgia would reflect distress about changes to "sense of place" associated with changes in Acland due to the acquisition of properties by APC and impacts on the landscape.

The NAC authors observed that:

"People who were attached to the area and who derived a sense of wellbeing from living in Acland are likely to have experienced a significant change in their sense of place, and for some, this led to a sense of loss and distress. Neighbouring residents who will be able to see the revised Project from their properties and those who will travel past are likely to find their sense of place affected in that the locality's landscape has changed."

The NAC authors noted that "Changes to the physical and social environment in the Acland area over the past 10 years have been substantial" and acknowledged that "these changes have distressed some residents who felt connected to the area, and valued its former attributes."

On the basis of the discussions cited above, the NAC authors claimed that the two health service providers they spoke to “did not identify any presentations by patients in relation to solastalgia or other mental health issues related to NAC.”

The NAC authors concluded that:

“In summary: There is no epidemiological evidence, and no evidence from the experience of the local hospital and general practice, which would indicate health issues are being caused by NAC, or would be expected to result from the revised Project.”

“Whilst investigations have shown that coal mining is unlikely to result in adverse health effects, and health professionals in the vicinity of the current NAC operations do not report any adverse population trends relating to the Mine, NAC recognises that it is important to ensure residents are aware of the facts regarding health and coal.”

Comments on NAC’s Additional Information Provided in Response to EIS Submissions

It is apparent that the NAC authors of the “Additional Information” have failed to satisfy the Section 6.1.3 Terms of Reference requirement for a “targeted baseline study of the people residing in the project social and cultural area, to identify the projects social issues, potential adverse and positive social impacts, and strategies and measures developed to address the impacts”.

In the absence of any objective scientific information, the NAC authors’ conclusions rest upon unspecified, informal discussions that they claim to have had with the Oakey Hospital Superintendent and the Oakey Hospital Director of Nursing.

The NAC authors’ claim that there “is no epidemiological evidence, and no evidence from the experience of the local hospital and general practice, which would indicate health issues are being caused by NAC, or would be expected to result from the revised Project” is seriously misleading because it suggests an evidentiary basis beyond comments made in an unspecified discussion with some Oakey health professionals.

It is very misleading to suggest that these very limited conversations support the claim that there is “no epidemiological evidence, and no evidence from the experience of the local hospital and general practice” of adverse health effects caused by NAC.

It is very misleading for the NAC authors’ to portray their conversations with a couple of health professionals as supporting the conclusion that “investigations have shown that coal mining is unlikely to result in adverse health effects”, and that “health professionals in the vicinity of the current NAC operations do not report any adverse population trends relating to the Mine”.

The NAC authors’ so-called “investigations” provide no scientific or reasonable basis for their conclusion that “coal mining is unlikely to result in adverse health effects”.

Even if conversations with a couple of “health professionals” do not provide anecdotal evidence of “adverse population trends” in mental health problems specifically associated with mining operations, the potential for adverse health impacts from mining cannot be dismissed.

Even if confirmed, a low incidence of reporting at a particular clinic of mental health problems specifically associated with mining indicates nothing meaningful about the real incidence of mining related adverse health impacts in the community. The occurrence of adverse mental health consequences associated with drought indicates nothing about the well documented adverse health impacts of coal mining on rural communities.

In conclusion, it is apparent that in their Additional Information the NAC authors fail to adequately examine or address potential social and mental health impacts, and continue to ignore the need for objective scientific information, relying instead upon general demographic statistics and very limited, unspecified, anecdotal evidence to support their conclusions and recommendations.

In my opinion, an adequate assessment of social and psychological impacts that satisfies the objectives and Terms of Reference for this EIS would require an independently conducted study that obtained standardised, scientifically valid data about the social and psychological impacts on individuals in a specified, representative sample of people potentially affected by the development.

I recommend that the relevant sections of the EIS dealing with social impacts be rejected until an appropriate study based on “qualitative, quantitative, and participatory methods” is carried out to satisfy the Section 6.1.3 Terms of Reference requirement for a “targeted baseline study of the people residing in the project social and cultural area, to identify the projects social issues, potential adverse and positive social impacts, and strategies and measures developed to address the impacts”. As required by the Terms of Reference, this study should properly take into account “the identity, values, lifestyles, vitality, characteristics and aspirations of communities in the social and cultural area, including indigenous communities.”

Please contact me if you wish to discuss this submission, or if you require further information.

Yours faithfully,

A black rectangular redaction box covering the signature and name of the sender.

[REDACTED]

From: [REDACTED]
Sent: Thursday, 9 October 2014 8:35 AM
To: [REDACTED]@newhopegroup.com.au); [REDACTED]
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Cc: newaclandproject@coordinatorgeneral.qld.gov.au
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[REDACTED]@newhopegroup.com.au
Cc: newaclandproject@coordinatorgeneral.qld.gov.au
Subject: TRIM: Part 3: Information request: issues raised in AEIS submissions; CGER requirements
Attachments: [REDACTED] New Acland AEIS - [REDACTED] - [REDACTED].pdf

HP TRIM Record Number: E14/279551

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From: [REDACTED]
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16. COMMENTS ON CONSULTATION AND ENGAGEMENT
 Given the number of issues raised here which relate to the consultation, engagement, negotiation and information provision which are critical of the processes and procedures adopted by NAC during their current operations and throughout the EIS Process for stage 3, the CG should be informed about when the improved communication and engagement strategies will be implemented and what these process will look like for residents that will be different to current practice. Also how will they be informed about the improved approach specifically rather than simply state that this has happened as part of the public notification of the AEIS.
17. My view would be that best practice communication means- as a key business strategy you inform and explain to your audience your range of communication strategies how these will be delivered, the frequency of delivery and the range of information that will be provided(Mitigation and Management commitments) - you then implement the strategies ensuring you deliver the promised communication strategies and also deliver on the outcomes you commit to as a result of communication. JRLF may be good example of where NAC has failed, in this regard (subject to the response from NAC on increased Mpta
18. If NHG specifically provided information as suggested above (perhaps in a newsletter which was solely focussed on Communication and Engagement) to residents this would also need to reference process and procedures for the following:

- Acland Management Plan
- Acland Colliery Conservation Plan
- Air Quality - Dust- Blasting - Vibration
- Water Resources
- Noise
- Complaints and Dispute Resolution process
- JRLF Monitoring of Operation and Decommissioning - [REDACTED] refer to increased rilling volumes
- Community Reference Group Process
- Road Closures
- Opportunities for Community Involvement and process related to this
- Land holder agreement process.
- Health Impacts

19. A key section of the community do not see NAC as a good corporate neighbour and NAC need to work harder to demonstrate their credibility, trust and strengthen their social licence to operate.

20. WORKFORCE NUMBERS

Given continued downturn in the mining industry and associated job losses should we seek clarification from NAC there current and predicted workforce numbers if this expansion proceeds. An up to date position would be useful when writing workforce management section of Social Chapter ad would enable us to ensure we have the latest information from NAC even if this has not changed.

A number of AEIS submitters has raised the question of validity of EIS job numbers given recent shift reductions and trialling of new equipment (e.g. Wirtgen) that may result in further job losses. Please respond to page 2 'economic benefits' of attached Word document: Submission on the New Acland Coal Mine [etc].docx' – submission from [REDACTED]

See my email sent today 8:36am

21. COMMENTS ON COMMUNITY ENGAGEMENT ACTION PLAN

Community Reference Group

22. NAC state on their website that the Community Reference Group "was established through a transparent and equitable process to select representatives from across the region as foundation members". It would be good if NAC could provide us with details of the process adopted for the establishment of this group and the appointment of any future members. In addition to this they reference a CRG Charter (which details roles) for the group in the EIS consultation Chapter. I suggest that we request a copy of this.

This information will help us understanding process, operation and roles.

23. Community Complaint and Dispute Resolution Mechanism

Suggest the issue raised by [REDACTED] (BOTTOM OF PAGE 18) are clarified by NAC

24. See attached pdf submission [REDACTED] [etc]' See my email sent today 8:36am – respond to statement that TOR requirements regarding investigation of mental health context and impacts has not been addressed

[Following relates to 'Project Memorandum No. 2_ Version 2' issued by NHG 2/10/14. For where [REDACTED] has noted response, nothing further is needed]

25. 7.1 Road Closures

26. Issues 1-5 and 8-10

Further to your reply to the issues raised in relation to road closures these are noted. However they are not considered to be sufficient to deal with the mitigation and management of the direct impacts that will affect residents as result of these closures. It is acknowledged that the Acland / Sabine Road provides a partial mitigation for residents but does not allow them to continue to access utilise and enjoy the region fully (as they currently are able to do) without experiencing additional specific impacts detailed ion my email of the 25 September as a direct result of the stage 3 expansion.. Given the requirement of the Terms of Reference to provide strategies as part of the EIS process that mitigate and manage direct impacts, advice will now be sought from the Coordinator General in regard to if there is the requirement to condition suitable outcomes to enable the resolution of the road closure impacts for residents.

27. Issue 6

Thanks for clarifying that Acland /Sabine Road will be fully sealed.

28. Issue 7

Given NAC response and their commitment to seal the Acland/Sabine can an additional commitment please be include in the commitment register that states " that the upgrade works along the Acland / Sabine Road will be undertaken before any road closures to ensure access to Acland township is maintained at all times"

29. 7.2 Community Reference Group/Community Information Sessions/ Community Newsletters

30. Issues 2a-2c

Noted and Minutes reviewed

31. Issue 2d

I take from your response that there has not been any specific group or individual information session in regard to the enhanced consultation and engagement process and practices or the specific issue raised by submitters between the closure of the public information period for the EIS and the public information period for the AEIS.

32. Can you tell me the extended operating hours of the NHG Community Information Centre and also the proposed dates for the forthcoming information sessions referred to in your response to assist me with drafting the CG Report.

33. Issue 2e

Noted

34. 7.3 Jondaryan Rail Load Out Facility

Noted – will come back to you if any further clarification required

35. 7.4 Acland War Memorial – Tom Doherty Park

Noted

With thanks

[Redacted]

[Redacted]

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[REDACTED]

From: [REDACTED]
Sent: Thursday, 9 October 2014 10:44 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: New Acland Stage 3: further info re flora impacts - Koala Offsets?

Thanks [REDACTED] – that's great. Re Koala – not an MNES for this project.

Regards

[REDACTED]

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AEIS
Submissions
and the
further
memos
informed
agency
conditions

From: [REDACTED]@ehp.qld.gov.au]
Sent: Thursday, 9 October 2014 10:42 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: New Acland Stage 3: further info re flora impacts - Koala Offsets?

[REDACTED]

As discussed this morning a full response to your emails is intended early next week. This response is intended to include recommendations for EA conditions in view of advice from the proponent (Memo No.2), 26 September meeting with the proponent, and the submissions on the AEIS you have forwarded today.

Koala

The Koala habitat (19.5ha in total) is likely to be subject to MNES offsets of the order of 1:4 by DotE depending on quality of habitat lost. The MSES offset would be exactly 1:4 if there were no MNES offset in place (in accordance with the Qld Env Offset Framework).

Flora map

There is a flora survey site location map at Fig 2 of Attachment C (Sept 2014 Offset Strategy) of the Project Memorandum No 2 ver 2.

Revised recommended conditions for a draft EA

A revision is underway of recommendations for conditions based on an EHP officer review of the further material from the proponent in their email dated 28 September 2014 and forwarded to EHP on 29 September 2014, and discussions with the proponent on 26 September 2014.

The revisions may include

- noise limits split into two for operations and construction and temporary limits for ML50232
- the scope of the blast monitoring program as the proponent's responsibility (D6)
- Table E1 include Marburg sandstone monitoring location
- Table E3 footnote explaining the need for monitoring data before defining water level triggers, additional monitoring point 4C
- Table F1 overflow points deleted and addition of two discharge points - RP1 and RP2
- Replace or remove the exceedance requirement E6
- Table F2 changes to monitoring frequency column
- Table F3 replace

██████████ is available from 14 Oct onwards for any backgrounding on the EA.

Note that EHP officers are reviewing the biodiversity materials including koala management for any further advice.

Happy to discuss.

cheers

██████████
Principal Impact Assessment Officer
Impact Assessment and Operational Support
Department of Environment and Heritage Protection
Telephone ██████████ Facsimilie 07 3330 5875
Email: ██████████ [@ehp.qld.gov.au](mailto:██████████@ehp.qld.gov.au)
9/400 George Street, Brisbane 4000
GPO 2454, Brisbane 4001

From: ██████████ [@coordinatorgeneral.qld.gov.au](mailto:██████████@coordinatorgeneral.qld.gov.au)
Sent: Friday, 3 October 2014 8:51 AM
To: ██████████
Cc: ██████████
Subject: RE: New Acland Stage 3: further info re flora impacts - Koala Offsets?

Beautiful – thanks ██████████

From: ██████████ [@ehp.qld.gov.au](mailto:██████████@ehp.qld.gov.au)
Sent: Friday, 3 October 2014 8:47 AM
To: ██████████
Cc: ██████████
Subject: RE: New Acland Stage 3: further info re flora impacts - Koala Offsets?

██████████
FP Grass is listed but only as near threatened so it does not need to be in the dEA and does need to be offset under the State offsets framework.

cheers

Principal Impact Assessment Officer
Impact Assessment and Operational Support
Department of Environment and Heritage Protection
Telephone [REDACTED] Facsimile 07 3330 5875
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GPO 2454, Brisbane 4001

From: [REDACTED]@coordinatorgeneral.qld.gov.au]
Sent: Tuesday, 30 September 2014 5:21 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: New Acland Stage 3: further info re flora impacts - Koala Offsets?

Hi [REDACTED]

In addition to our previous email below, I have just noticed that you might not have been informed of a separate query we had in regards to *Digitaria porrecta* (Finger Panic Grass).

This species is not listed in table H4 of the dEA - *Matters of State Environmental Significance*, however is tabulated in section 4 of NACs revised Biodiversity Offsets Plan. Finger panic grass was delisted as a MNES earlier this year and remains currently listed as a Threatened Species in the NC Act Regulation. I asked [REDACTED] if this species should be listed in Table H4 of the dEA and additionally if there would be any changes in offset requirements given the MNES status change.

Many thanks

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www.dsdiq.qld.gov.au

From: [REDACTED]
Sent: Tuesday, 30 September 2014 12:15 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: New Acland Stage 3: further info re flora impacts - Koala Offsets?

Hi [REDACTED]

Greatly appreciated if you could check in with whomever [REDACTED] forwarded the below to, as I'd like to add the following to our request for advice:

Given recent legislation changes viz. ecology – is the following still correct?

... the koala is considered a species of special cultural significance by the Queensland State Government ...

A response on both [REDACTED] and my questions in coming days (if possible?) would be greatly appreciated.

Thanks

[REDACTED]

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From: [REDACTED]
Sent: Wednesday, 24 September 2014 3:42 PM
To: [REDACTED]@ehp.qld.gov.au; [REDACTED]@ehp.qld.gov.au
Cc: [REDACTED]
Subject: FW: New Acland Stage 3: further info re flora impacts - Koala Offsets?

Hi [REDACTED] and [REDACTED]

Forwarded below is an email [REDACTED] sent to [REDACTED] and [REDACTED] yesterday afternoon in regards to NACs flora impacts.

In relation to the 2nd point on Koalas, [REDACTED] and myself are now wondering what level of detail EHP are envisioning to apply for offset conditions. Depending on this detail, OCG can then decide if imposed conditions should apply.

The March 2013 TOR for the project required consideration of the koala as a species of 'special cultural significance'. Given the recent changes in legislation, I am wanting to understand what offset conditions/management requirements about koalas may be set by EHP within the EA framework, and what may need to be imposed by the Coordinator-General.

We are looking forward to meeting with you again on Friday morning to discuss the draft EA conditions already received.

Many thanks

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From: [REDACTED]
Sent: Tuesday, 23 September 2014 4:23 PM
To: [REDACTED]@newhopegroup.com.au)
Cc: New Acland Coal 3; [REDACTED]
[REDACTED]@environment.gov.au)
Subject: FW: New Acland Stage 3: further info re flora impacts

Hi [REDACTED] [REDACTED]

Thanks for the send-through yesterday of amended figure 7-6 which shows the full rail corridor and confirmation of additional 2ha impact of poplar box.

- 1) Given the additional impact, I will need EIS chapter 7 to be updated to confirm the entire rail spur has been considered in its assessments – e.g. at a minimum: updating EIS figure 7-3: Location of flora survey sites; and EIS figure 7-4: Location of fauna survey sites (this was requested in my initial email of 10/9/14, so perhaps that's being worked on already). Also associated tables that detail survey type, duration and date need to be reviewed; along with survey methodology.

In addition, EIS chapter 7 makes conclusions about fauna which may prefer poplar box that was not located – e.g. collared delma; yakka skink; five-clawed worm-skink; and fauna that was located – e.g. koala; and flora that may co-locate that was confirmed on-site: finger panic grass; belson's panic, so it needs to be made clear that such discussions include the rail spur.

EIS chapter 7 also says poplar box along the rail spur is located outside the disturbance footprint.

These matters, along with the quantum of poplar impacted, and any other references in the chapter that are relevant need to be updated so regulators can be certain the base work has been addressed.

Appreciated if the updated chapter could be provided with 'tracked changes' applied.

I note that Appendix M of the AEIS is being updated re the offset calculations, so that's great.

Also needed is:

- 2) (i) Koala Management Plan and commitments – please confirm if any amendments are needed to the KMP or AEIS information to take into account the additional 2ha of poplar box.
(ii) confirm the amount of impacted koala habitat for both the spur and mine. Within this, clarify why

the EMP says 4.2ha of koala habitat will be cleared; the AEIS KMP says 18ha; and the EIS chapter 7 says 10.3ha of koala habitat will be impacted
(iii) quantify the amount of koala habitat that will be rehabilitated in the NC corridor
(iv) fig. 4.1 of the AEIS KMP shows stage 1 and stage 2 rehab, but there's no discussion in the document to expand on this – what does this mean?

- 3) MNES – [REDACTED] has requested the following: *The survey work on the rail loop should be reflected in the mapping for MNES. The potential habitat for MNES species should be defined, particularly for Belson's Panic which has been identified on site and requires offsetting.*

Given the additional information, a clear description of the locations where the Austral Cornflower were identified along the rail spur and the suitable habitat to be impacted for this species would also require inclusion.

With regard to the Grey-headed Flying-fox (GHFF) I need to get further clarification of the importance of the site given the known roost sites at Toowoomba and Dalby. The information I have available is that while the majority of foraging occurs within 15 km of the roost site GHFF can forage up to 50 km from roost sites which covers the Acland area.

Revised maps that show MNES flora mapping sites, fauna mapping sites and TECs that include the spur are therefore required. Additional to above, the EIS says Austral Cornflower will not be impacted on the rail corridor, but the map confirms a location on the spur – discussion is therefore needed.

An ETA of when the above will be provided is needed ASAP given we are currently writing CGER chapters. Delivery of the above needs to be prioritised to ensure close-out of the CGER is not delayed.

Thanks

[REDACTED]

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From: [REDACTED]@newhopegroup.com.au]
Sent: Monday, 22 September 2014 3:33 PM
To: [REDACTED]
Subject: RE: Flora and fauna survey sites; REs; TECs

From: [REDACTED]@coordinatorgeneral.qld.gov.au]
Sent: Wednesday, 10 September 2014 2:50 PM
To: [REDACTED]
Subject: FW: Flora and fauna survey sites; REs; TECs

A re-send to correct address this time – cheers [REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Wednesday, 10 September 2014 2:46 PM
To: [REDACTED]@newhopegroup.com.au; [REDACTED]@newhopegroup.com.au); [REDACTED]
[REDACTED]@newhopegroup.com.au)
Subject: Flora and fauna survey sites; REs; TECs

Hi [REDACTED]

Are there maps in the EIS docs that show flora and fauna survey sites; REs; and TECs that include the total rail corridor?

Also – is there any discussion on the impact on the above specific to the 8km rail?

Leads appreciated.

Thanks

[REDACTED]

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[REDACTED]

We can confirm that the analysis in the EIS and AEIS on flora and fauna presence and impacts includes consideration of the rail spur and that the proposed offset areas of 250 ha in section 6.2 of the Biodiversity Offsets Strategy (Appendix M of the AEIS) comprises a co-location of the following REs: 11.3.2, 11.3.17, 11.9.5, 11.9.10 and 11.9.13, which also include the Brigalow TECs.

We acknowledge that there is something not right within the tables in the Appendix M because the REs disturbed for the corridor, listed below, are not shown:

RE	Veg Comm	Status	Area (ha)
11.3.2	Poplar Box	Of Concern	0.423572
11.3.17	Poplar Box	Of Concern	1.771856
Total			2.195428

We will get back to you with detail of the findings ASAP, but please rest assured that New Hope is committed to providing full offsets for all impacted REs and on top of that, New Hope will look into restoring koala habitat areas locally, as shown in Figure 4.1 (page 12) of the KSPM.

Pls also find attached Figure 7.6 (Flora Fig) ☺!

Cheers,

[REDACTED]
Manager Environment, Policy and Approvals

.....
New Hope Group | Corporate Office

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E: [REDACTED]@newhopegroup.com.au

W: newhopegroup.com.au
.....



From: [REDACTED]@coordinatorgeneral.qld.gov.au]

Sent: Wednesday, 17 September 2014 4:07 PM

To: [REDACTED]

Subject: RE: Flora and fauna survey sites; REs; TECs

Hi [REDACTED]

Further to below, as discussed I'll need your response to confirm if analysis in the EIS and AEIS on flora and fauna presence and impacts includes consideration of the rail spur, and that ultimately, that the spur impacts are included in the offsets calculations.

On MNES, [REDACTED] has been ill the past couple of days and so we won't receive his feedback until Monday.

However an early heads-up that further information on the flying-fox MNES species will be needed. The EIS states there have been sightings on-site, but does not specify/map where; or discuss when, how many; or habitat location/impacts. [REDACTED] will be providing further about this.

Apologies this has come late in the game, however I'd say this information should be available, possibly in the original project EIS.

Thanks

[REDACTED]

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From: [REDACTED]@newhopegroup.com.au]
Sent: Wednesday, 10 September 2014 4:40 PM
To: [REDACTED]
Subject: RE: Flora and fauna survey sites; REs; TECs

Hi [REDACTED]

The rest of the team is out of the office this afternoon.

I will check with them tomorrow morning.

Regards,

[REDACTED]

Project Manager - New Acland Project

.....
New Hope Group | Corporate Office

T: [REDACTED] **F:** +61 7 34180 332

E: [REDACTED]@newhopegroup.com.au

W: newhopegroup.com.au
.....



[Redacted]

From: [Redacted]
Sent: Monday, 13 October 2014 11:32 AM
To: [Redacted]
Subject: RE: New Acland Project - Response to draft EA and General Clarifications

Thanks for this response, [Redacted] – that's great.

Best regards

[Redacted]

From: [Redacted]@dnrm.qld.gov.au
Sent: Friday, 10 October 2014 1:10 PM
To: [Redacted]
Cc: [Redacted]
Subject: RE: New Acland Project - Response to draft EA and General Clarifications

Hello [Redacted]

Thank you for your query. I wish to provide the following advice from the Deputy Chief Inspector of Explosives, [Redacted]

The safety and health legislation applicable to the matter of fume is covered under the *Coal Mining Safety and Health Act 1999* and the *Explosives Act 1999*.

The legislation requires reporting of incidents (including fume events where persons are exposed or required to be moved to prevent exposure and if outside the Blast Exclusion Zone) to the relevant inspectorate.

The Mines Inspectorate and the Explosives Inspectorate have issued Queensland Guidance Note 20 Management of oxides of nitrogen in open cut blasting. Audits and inspections of mines are conducted by these inspectorates. QGN 20 is provided by the department as guidance in regards to preventing, managing and treating exposure to fume (oxides of nitrogen particular NO₂). It can be accessed here: <http://mines.industry.qld.gov.au/assets/general-pdf/QGN-mgmt-oxides-nitrogen.pdf>

If you have any further questions please do not hesitate to contact me.

Warm regards,

[Redacted]
Planning Officer, Planning Services South
Department of Natural Resources and Mines
Telephone: [Redacted] **Facsimile:** 07 3884 8079
Email: [Redacted]@dnrm.qld.gov.au

From: [Redacted]@coordinatorgeneral.qld.gov.au
Sent: Thursday, 9 October 2014 4:02 PM
To: [Redacted]
Cc: [Redacted]
Subject: RE: New Acland Project - Response to draft EA and General Clarifications

Hi [Redacted]

↑ Agency
advice
on blasting
— request for
info informed
by AEIS
Submissions
(see
reverse
page).

A number of submitters on the EIS and AEIS for New Acland Stage 3 raised concerns with fume events from blasting.

I am seeking advice from NRM on:

- Current laws/policies/guidelines that miners must adhere to to avoid fume events
- As per above regarding mandatory reporting of a fume event

This may be cited in the CG report for the project.

Thanks in advance

[REDACTED]

[REDACTED]
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From: [REDACTED]@dnrm.qld.gov.au
Sent: Monday, 29 September 2014 12:28 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: New Acland Project - Response to draft EA and General Clarifications

Good afternoon [REDACTED]

[REDACTED] advice on the Proponent's response to DNRM's V1 submission on the AEIS for New Acland Stage 3 is as follows:

NAC's response to DNRM's comments on the IESC matters in combination with NAC's acceptance of the proposed draft conditions have addressed the DNRM Groundwater comments on the AEIS.

DNRM note NAC's comments do not address the amended GW offset condition for Oakey Creek Alluvium and the Main Range Volcanics, only the Oakey Creek Alluvium. It is assumed that NAC did not have the amended conditions at the time their response was drafted.

DNRM would anticipate a similar comment to the Oakey Creek Alluvium condition.

If you have any questions please feel free to contact me.

Warm regards,

From: [REDACTED]@coordinatorgeneral.qld.gov.au

To: [REDACTED]

Good morning [REDACTED]

I am keen to gain [REDACTED] advice particularly on NHG's reply to his identified outstanding IESC matters within the above section.

████████████████████

(

From: [REDACTED]@newhopegroup.com.au]

To: [REDACTED]

Subject: New Acland Project - Response to draft EA and General Clarifications

[REDACTED]

September..

Regards,

[REDACTED]
Project Manager - New Acland Project

.....
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