Date: 3rd November 2014
ref:

Mr Paul Forward
The Chairperson
NSW Planning Assessment Commission

Mr Chairman,

RE: R025/14 – DUBBO ZIRCONIA REVIEW

Thank you for the opportunity to address the Planning Assessment Commission regarding the Dubbo Zirconia Project.

Diversifying the industry base of the Dubbo area

The Dubbo Zirconia Project, if approved, will provide the community of Dubbo and surrounding areas with a huge ongoing economic benefit. The mine itself will bring much needed employment to the area and the resultant knock on effect will resonate through the whole commercial community of Dubbo through increased demand for goods and services – again providing further employment opportunities in these secondary and support industries.

Dubbo and the surrounding areas are historically heavily reliant on agriculture to sustain economic sustainability and growth. The fortunes of the area are pinned to the fortunes of the agricultural industry. Regular and lengthy droughts and other destructive natural events are a continual presence overshadowing the regions economy. The Dubbo Zirconia Project is an opportunity for the Dubbo region to diversify its industry base and to hedge its economy against the cyclical and unpredictable nature of agriculture. The Dubbo Zirconia Project will ameliorate the harshness of the effects of an economy predominantly reliant upon agriculture. It will provide a measure of depth and balance to the economy of the local area - which has to this point been missing.

Community Consultation

The proponents, Alkane Resources, have provided a regular and extensive community consultation process over the past few years. Their public information sessions have been well balanced and informative. They have used digital and conventional media to ensure extensive community reach and penetration on all aspects of the project. Alkane Resources have been very accommodating in their responses to all questions posed to them on any aspect of the projects operation and impact. It should also be noted that of the public information sessions we attended the community representation was very scant. From our point of view Alkane have been very open and transparent with respect to all aspects of the project and the substantial Environmental Impact Study that was submitted provides evidence of that.

It is also important to note that the Dubbo Zirconia Project has been a long running project. Considerable resources have been expended in the research and scoping out of the project. It is not a project that has been rushed to the table with little thought or regard given to it. It is
a project of some significance born from extensive research, due diligence and community consultation.

**Benefits to local businesses and community groups**

We are a medium size business which operates in the transport industry. The Dubbo Zirconia Project is an opportunity for us, as well as other local businesses, to employ more people and to help strengthen the Dubbo economy. For us, the additional employment would come in form of additional truck drivers and support staff. The economic flow on benefits to the local economy and community from this project cannot be overstated. On a number of occasions Alkane Resources have publicly stated that local labour and suppliers will be utilised wherever possible. Nearly all local businesses and community groups would stand to gain some benefit from a stronger local economy.

**Carbon Neutral Options**

Whilst there may be some commercial benefit for Transforce derived from the Dubbo Zirconia Project if we were to undertake work for Alkane Resources, it does not necessarily follow that we would automatically support a project which we felt would be harmful to the environment or the broader community. Transforce is strongly committed to the environment and this is well evidenced by the fact that Transforce was the very first transport company in Australia to be certified Carbon Neutral. In fact, Transforce remains the only transport company in Australia to be certified Carbon Neutral.

Alkane Resources has further demonstrated its own commitment to the environment by taking an active interest in the Transforce Carbon Neutral journey and Transforce would like Alkane Resources to consider the provision of Carbon Neutral transport services as part of the Alkane Resources supply chain and logistics processes.

**Safely handling increased heavy vehicle movements**

Increased traffic flows to and from the DZP site, including heavy vehicles, will be accommodated by the extensive road and infrastructure upgrades that Alkane Resources have proposed. To further enhance road safety and ensure traffic flow efficiencies along the freight corridor Transforce would encourage Alkane Resources to consider the following with respect to heavy vehicle transport requirements:

1. The use of formal and documented driver training to ensure a high standard of technical driver competence and compliance with NSW legislative requirements and specific DZP corporate requirements
2. Compulsory driver medicals in accordance with Trucksafe requirements
3. Ensuring contracted transport companies can demonstrate compliance with industry and Government accreditation schemes (e.g. Trucksafe and the National Heavy Vehicle Accreditation Scheme – for Fatigue, Mass Management and Maintenance Management)
4. Ensuring all contracted transport companies have an extensive Work Health and Safety system in place which includes a risk assessment specifically related to fatigue management and speed management
5. The use of robust Alkane Resources internal audit procedures with respect to contracted freight carriers for compliance with legislative obligations and Alkane Resources/DZP corporate governance requirements
6. The transportation of dangerous goods and over size and over mass items of freight are conducted by appropriately licensed and experience transport operators

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Safety | Service | Environment | Community
7. The use of transport carriers who utilise a modern fleet of well maintained vehicles fitted with the latest technology available including:
   a. Satellite tracking (including the ability to be notified of overspeed alerts in real time)
   b. In vehicle cameras
   c. Electronic Braking Systems (EBS)
   d. Anti-lock Braking Systems (ABS)
   e. Speed limiting
   f. Automatic Collision Avoidance

Summary

The Dubbo Zirconia Project has the real potential to diversify the Dubbo area’s industry base and shift the reliance on economic support away from agriculture. Whilst agriculture will always remain a key and vital part of this region’s economy, the cyclical and often volatile nature of agriculture can translate into slow or stagnant economic growth for Dubbo. The Dubbo Zirconia Project has the potential to balance the primarily agricultural dependant economy and provide some level of economic stability for the area.

The environmental impacts of this project have been extensively and comprehensively examined and reported upon in the submitted Environmental Impact Statement. Alkane Resources have demonstrated a track record for operating first class mining ventures in the area at both Peak Hill and Tomingley and there is no reason to suggest that the Dubbo Zirconia Project would be any different.

Similarly, any road transport or road safety concerns can be readily addressed via the road and infrastructure upgrades already proposed by Alkane Resources and also by contracting with only those heavy transport operators who exhibit the highest standards of safety and who embrace existing and emerging technology.

Alkane Resources have the ability to utilise local people and local businesses for the Dubbo Zirconia Project and the economic benefits if this policy position is put into effect are enormous.

Submitted for the information of the Commission.

Stevé Fieldus
Managing Director
Transforce