Anthony Berecry
Presentation to Planning Assessment Commission
Rocky Hill Coal Project.

Commissioners

I am a retired Coal Geologist. I worked for 5 years on the initial exploration and mine planning for BMI Mining's exploration leases at Stratford In the early 80's. Now, Yancoal's Stratford Coal Mine, which is just to the south of the Rocky Hill proposed site. In fact I defined and named the coal seams that GRL are proposing to mine.

I have a number of concerns in Rocky Hill's Environmental Impact Statement on how they intend to manage the resource and its waste material.

The Stratford Coal mine recovers 39% coking coal product with the rest comprising thermal coals. Stratford coking coal is made up of both soft and hard coking coals with a quality commensurate with other Hunter Valley Collieries. Stratford mines the same seams proposed by Rocky Hill where they claim 95% high quality coking coal and 5% thermal coal.

I have repeatedly raised this issue before but only get non-specific responses from GRL which raises my concern with what is happening to the uneconomic coal and its associated roof, floor and interbedded rock material.

To date, I haven't located any testing analysis of the uneconomic coal seams and their associated roof and floor materials.

I note from the GRL typical cross sections in the EIS mine plan for the Main pit, Bowens Road pit and the Avon pit, GRL have missed up to seven coal seams. They also omitted another 5 seams to the immediate east of the Avon coal member of which they claim to be too steep to mine.

GRL EIS states that a negligible amount of coal will go to the overburden mounds. However at the last CCC meeting on 6th October they confirmed that coal seams up to 200-300mm will go directly to the overburden piles.

Rocky Hill have plans to produce 21Mt of Coking Coal therefore it is reasonable to expect in the order of 32Mt of thermal and reject coal plus an estimated 16 Mt of associated roof, floor and interbedded PAF materials, ending up in the overburden piles.

The EIS has some information on how they intend to manage the breaker rejects and uneconomic coal seams. My main concern is how GRL will effectively manage reject material in the order of 48 Mt. (just visualise 800,000 sixty-tonne truckloads).

When coal breaks down it releases BTEX chemicals, salts, methane gases, heavy metals and organic leachates which all have the potential to create a future disaster to agricultural land and downstream waters for years to come if not managed well. If fire occurs in the

overburden, as recently happened at Yancoal's Duralie Coal Mine, to the South of Stratford Coal Mine, then we can expect acrid and noxious sulphide fumes on the edge of town.

Let's consider GRL's mine in the context of the existing coking coal resources in NSW.

From the Dept. of Industry Resource and Energy information

- There is 3.5Bt of coking coal in existing NSW coal mines, consisting of both measured and inferred reserves.
- NSW coking coal exports since 2004 has been a stable 25.5Mt and the Dept. don't anticipate any surge in future demand.
- That represents about 70 years of measured reserves and you can add another 70 years for the inferred reserves. If demand was to increase it can readily be met by existing NSW mines.

In America they are turning to a process called Direct Reduced Iron which uses natural gas and requires less coke and in some cases no coke. The process is less expensive and about 21 million tonnes of steel in the world is made this way now. As the technology develops we could see all blast furnaces redundant in the near future.

The Australia Institute states:

"Economic assessment of the Rocky Hill project understates costs and overstates benefits. It is unlikely to be in the economic interest of NSW or the Gloucester community to approve this project."

My objections to the proposed Rocky Hill mine are:

- NSW already has 3.5Bt of coking coal in existing mines enough for the next 70 to 140 years.
- There has been a failure by GRL to satisfy DGR requirements of "efficiency of coal resource recovery".
- The Rocky Hill proposed mine plan for reject and uneconomic coal has the potential outcome to become an environmental disaster.
- This proposed mine is the smallest coal mine in NSW and does not justify the potential environmental, social and economic damage to the local area.

I recommend that the Commission reject the application for a mining licence.