



Dedicated to a better Brisbane

14 September, 2016

Mr Andrew Connor
Executive Director
Industry, Development and South QLD Compliance
Department of Environment and Heritage Protection
Via Email: ESComplianceBrisbaneMoreton@ehp.qld.gov.au

Re: Mt Coot-tha Quarry Blasting Activities EPPR00447313

Dear Mr Connor

I refer to your correspondence dated 26 July 2016 and received via email on 16 August 2016 in which the Department asked Council to consider voluntarily reducing blast and vibration limits.

For economic and environmental reasons, this simply is not possible. We outline why below.

Value to Council and the State

Quarry operations in various forms have existed at this site since the late 1800's and the site has been operated by Brisbane City Council since its formation in 1924. Mt Coot-tha Quarry is a key asset for Council that continues to provide cost effective, high quality asphalt aggregates to support the needs of all residents and visitors to Brisbane.

The Mt Coot-tha Quarry directly employs approximately 20 people and indirectly supports at least 15 contractors and suppliers.

As you would be aware Mt Coot-tha Quarry is recognised by the Queensland Government as a Key Resource Area known as KRA42. Matters relating to the protection and administration of extractive resources that are deemed state significant are covered under State Planning Policy. In April 2016, KRA42 indicates 'The resource is sufficient for another 12-16 years based on current production rates.' This is in keeping not only with Council's intended use of the quarry but also with information given to the local community. Contrary to a comment in your correspondence, Council has not resolved to further extend the life of the quarry beyond this time.

Council operates Mt Coot-tha Quarry with a self-imposed production cap of 410,000 tonnes per annum. This cap has been in place since a significant community consultation process was established in 2002, following the extensive supply of materials during the construction of the Inner City Bypass. Council informed the community at that time that the extractive life of the quarry was at least until 2033.

Accordingly, with respect, Council considers your Department has made an incorrect statement in its correspondence:

In addition to residential proximity and technological advancements, a recent decision by BCC to extend the quarry life has increased community expectation that the quarry will demonstrate continual improvement and comply with best practice noise and vibration limits.

Against that background, Mt Coot-tha Quarry has a long history of environmental compliance and it continues to operate in accordance with the conditions of its prescribed environmental authority EPPR00447313.

Adverse environmental and economic consequences should blast and vibration limits be reduced

DEHP's suggestion to further limit the site by reducing blasting and vibration limits raise the following significant issues for Council:

1. Council has a demonstrated history of compliance to existing environmental conditions and has invested, planned and developed the quarry operations around existing approval conditions.
2. As discussed above, Council has already implemented a production cap which places significant commercial burden on the operations of the quarry. Operating the quarry at this production limit substantially reduces the environmental and community impact of Mt Coot-tha Quarry. However further reducing the blasting and vibration limits may make the quarry operations uneconomic and may even cause the quarry to close before 2033 at significant cost to the Brisbane ratepayer.

3. Quarry management have initiated and incorporate 'best practice' blasting design and techniques into the operations. Each blast is specifically designed to reduce the impacts beyond the site boundaries. I note your letter suggests that Council is not adhering to best practice for noise and vibration. In this respect, Council considers that it already complies with the Department's Guideline – Noise and vibration from blasting.

Furthermore, Council engages third party experts to design, monitor and provide oversight of the quarrying operations. These experts have considerable national and international experience and are renowned for being industry leaders. We respectfully disagree with any suggestion that this quarry is not operated at best practice.

4. Blasting is the most effective method of fracturing hornfels stone prior to further processing. As you would appreciate, hornfels stone is exceptionally tough. Reducing blasting limits creates further economic and environmental burden to the operations of the quarry. Reduced blasting limits will result in:
 - a. increased oversize rock generation;
 - b. increased in-pit rock breaking and handling using mobile equipment;
 - c. increased hours for crushing and screen operations;
 - d. increased potential for noise and other nuisance;
 - e. increased costs for crushing and screening operations and increased electricity usage.

These burdens are economic and environmental, with the potential to significantly increase Council's impact on the environment and the local community.

5. A reduction in blasting limits will lead to an increased number of blasts undertaken to maintain quarry operations. This is counterproductive as it has the potential to exacerbate environmental and community adverse impacts.
6. Geotechnical experience on-site would indicate that Council would not be able to fully comply with the reduced limits proposed by DEHP. Council endeavours to plan its blast design to achieve a net 5mm/s ground vibration peak particle velocity where practicable.
7. The quarry pit and mine planning over recent decades has been developed around current approved licence conditions and retrospective mine development is unreasonable and impractical.

Commercial In Confidence

Whilst Council cannot agree to voluntarily reducing existing environmental limits we reassure the Department that Council is committed to minimising our environmental and community impact. Council has provided extensive information to the Department of Natural Resources and Mines regarding our proactive and ongoing commitment to improving blasting operations at Mt Coot-tha Quarry.

Community consultation

As discussed above, Council has been liaising and disseminating detailed information about the quarry, its operations and lifespan to the local community for more than 10 years.

Council currently notifies by email about 80 affected residents approximately 48 hours prior to any blast. Included in the mail-out are "groups". In fact, there used to be a community consultation group between the quarry and the resident representatives but this went into recess at the request of the resident's chairman.

Council finds email notification administratively efficient, and has generally received support for this approach from the relevant residents. In this regard, it should be noted that only a small minority of residents would like notification via multiple technologies.

All residents are invited to attend Lord Mayor and Civic Cabinet Listens Forums to discuss any concerns residents may have in their local Wards or across Brisbane. Recently two people who live near the quarry attended such a forum. The quarry was discussed.

Council considers its communication strategy works well.

Please do not hesitate to contact me should you require any further information.

Regards

s.49 - Personal Information (signature)

Mica Turner
Executive Manager
Field Services Group
Brisbane Infrastructure
Brisbane City Council



Department of
**Environment and
Heritage Protection**

Ref EPPR00447313

26 July 2016

Mr Terry Bird
Branch Manager
Mount Coot-tha Quarry, Brisbane City council
152-170 Mount Coot-tha Road,
Toowong, QLD 4066

Dear Mr Bird,

RE: Mt Coot-tha Quarry blasting activities

The Department of Environment and Heritage Protection (EHP) refers to a meeting with Brisbane City Council (BCC) representatives and the Department of Natural Resources and Mines (DNRM) representatives on 14 June 2016 to discuss environmental limits associated with blasting, general quarry noise and community engagement protocols at the Mt Coot-tha Quarry.

As you are aware, BCC is the holder of Environmental Authority EPPR00447313 that authorises the extractive activity at the Mt Coot-tha Quarry.

At the meeting EHP raised for discussion, blast limits for overpressure and vibration, and asked BCC for its' views on voluntarily reducing blast and vibration limits. The basis for this request is as follows:

- Although the quarry has operated for decades, BCC has permitted residential development within close proximity to the quarry. Some residents are concerned about property damage due to vibration from blasting and it seems appropriate for BCC to operate the quarry against contemporary limits given the residential encroachment that has occurred.
- Since the permit was issued, technological developments have led to strategies that reduce noise and vibration from quarry blasting.
- In addition to residential proximity and technological advancements, a recent decision by BCC to extend the quarry life has increased community expectation that the quarry will demonstrate continual improvement and comply with best practice

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noise and vibration limits. Adhering to and committing to comply with current best practice limits for noise and vibration in the environmental permit seems appropriate and may could assist to enhance BCC's community messaging about the future of the site and its management.

EHP requests that BCC consider voluntarily agreeing to reduce blast and vibration limits within Environmental Authority EPPR00447313 to reflect EHP's current standard for blast and vibration limits for quarries as outlined in the enclosed guideline (page 1).

Also, during the meeting EHP enquired whether BCC has established a formal community engagement plan for the Mt Coot-tha Quarry and if so, whether BCC has evaluated the effectiveness of the plan. During the meeting, BCC advised of many continual improvement programs at the quarry however it is unclear whether the current plan is delivering relevant information that may assist to placate concerned members of the community. For example, community members have raised with EHP that having an option to receive a text message notification of a pending blast would prevent surprise and shock when blasting does occur.

EHP requests that BCC consider the matters raised and advise EHP whether it will voluntarily agree to reduce blast and vibration limits in Environmental Authority EPPR00447313. EHP also requests that BCC evaluate the effectiveness of the current community engagement plan to ensure it best delivers information about BCC's quarry management practices to the community.

Please respond to this this correspondence in writing by mailing to GPO Box 2454, Brisbane QLD 4001 or email to ESComplianceBrisbaneMoreton@ehp.qld.gov.au

EHP thanks you for your time considering this matter and looks forward to hearing from you. Should you have any further enquiries, please contact Ms Sarah Rowe, A/Team Leader of the department on telephone 3330 5368.

Yours sincerely

s.49 - Personal Information (signature)

Andrew Connor
Executive Director
Industry, Development and South QLD Compliance
Environmental Services and Regulation
Department of Environment and Heritage Protection

Enc. Guideline – Noise and vibration from blasting