

18th September 2026

Northern Regional Planning Panel
C/- Tamworth Regional Council
PO Box 555
TAMWORTH NSW 2340



Dear Sirs/Madams,

RE: Strathmore Quarry - Human Health Risk Assessment (HHRA)

Oats Block Pty Ltd has reviewed the 54 public submissions provided by Council following the public consultation undertaken in relation to the Quarry Human Health Risk Assessment (HHRA) and its independent peer review.

The HHRA author, EnRiskS, also reviewed the submissions, as detailed in the attached letter dated 17 September 2026.

The matters raised in the submissions have been carefully considered. Community concerns unrelated to the HHRA were previously addressed in detail in the original Environmental Impact Statement (EIS) and accompanying specialist assessments, including those relating to traffic, noise, air quality, groundwater and visual impact. These assessments were prepared having regard to the applicable statutory requirements, guidelines and technical standards.

Importantly, the HHRA and independent peer review have specifically considered the potential human health implications associated with respirable crystalline silica (RCS). The findings of the HHRA, as reviewed by the independent peer reviewer, indicate that the predicted RCS exposures associated with the proposed quarry do not present a significant risk to public health when the proposed mitigation and management measures are implemented.

Oats Block Pty Ltd remains fully committed to implementing the dust mitigation and management measures identified in the EIS and Air Quality Assessment. The company will also remain responsive to reasonable community concerns and will continue to appropriately monitor and manage potential dust impacts throughout future operations.

In this context, Oats Block Pty Ltd respectfully requests that the Northern Regional Planning Panel have regard to the above commitments when considering the public submissions, together with the detailed technical assessment undertaken through the HHRA and independent peer review process.

Kind Regards,

A handwritten signature in blue ink, appearing to read "Scott Waters", is positioned above the printed name.

Scott Waters
Director



17 September 2026

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C/- Quarry Plan NSW

Attention: Matthew Goodwin

Re: Strathmore Quarry, Human Health Risk Assessment for Respirable Crystalline Silica

Environmental Risk Sciences Pty Ltd (enRiskS) was engaged by Quarry Plan NSW, on behalf of Oats Block Pty Ltd, to undertake a human health risk assessment (HHRA) in relation to potential exposures to respirable crystalline silica (RCS) from the proposed Strathmore Quarry (the “project”). The HHRA was provided for consideration in March 2026.

Since that time, the assessment has been placed on public exhibition and submissions have been received from the community on the HHRA. A number of documents detailing the community submissions have been provided including:

- HHRA public submissions
- DA Peer Review of HHRA by EnviroScience.

The HHRA was focused only on the health risks related to the potential for RCS and dust to leave the site and reach relevant residential areas nearby. Other matters raised in the submissions were not part of the HHRA and the individual technical reports on noise, water etc need to be reviewed to address those matters.

Many of the submissions raise concerns about dust and the potential for RCS to be present in that dust. The following aspects are noted in relation to the approach taken in the HHRA to clarify the findings and the adopted approach:

- Air quality modeling was undertaken by NorthStar based on NSW EPA requirements (NSW EPA 2022) not by enRiskS.
- It is normal practice for specialist air quality modelers to undertake the air quality modeling and for health risk assessors to make use of that data to assess potential health risks due to changes in air quality arising from a project.
- Meteorological data used in the modelling were based on an assessment of 5 years of such data from a Bureau of Meteorology weather station – in this case 2018-2022. This assessment is included in the air quality modelling report and it found that data for the year 2020 was the most representative year in line with the processes recommended by NSW EPA.
- This means all conditions across a representative year have been considered – times when there were calm conditions and times when there were high winds so daily or 1 hour averages used in assessments are based on the worst case conditions (in this case high winds in the direction of the residential areas) while annual average concentrations give a



good understanding of the long term average based on the various types of activities at the site.

- Particles are always present in air due to windblown dust, vegetation degradation, urban activities, vehicle movements etc.
- PM_{2.5} are very fine particles mostly related to combustion emissions (i.e. vehicle emissions, cooking, BBQs, fires, bushfires etc).
- PM₁₀ includes larger particles which are more normally part of the mix when earthworks are being undertaken (larger particles like soil particles, sand particles, etc).
- NSW operates an air quality monitoring station in Tamworth¹ which indicates in the last week hourly PM_{2.5} varied across a day from around 1 to around 12 µg/m³ while hourly PM₁₀ concentrations varied across a day from around 10 to 30 µg/m³.
- NSW guidance indicates hourly PM_{2.5} concentrations less than 25 µg/m³ and hourly PM₁₀ concentrations less than 50 µg/m³ indicate good air quality.
- The air quality modeling indicated that the change in PM_{2.5} concentrations arising from this project would be less than 0.1 µg/m³ as a long term average over a year and 0.5 to 2.4 µg/m³ for 24 hour averages.
- The HHRA assumed that all PM_{2.5} modeled from the works would be respirable crystalline silica – i.e. the assessment was based on a worst case assumption – that 100% of the dust generated at the site was RCS and no other soil, sand, minerals would be present in that dust.
- When doing a HHRA it is common practice to make worst case/conservative assumptions when specific data are limited. In this case, the measurement of silica in the mudstone to be quarried was limited to 1 sample. There are 2 approaches when this is the case – undertake analysis of more samples – or – assume the maximum possible value relevant for the measurement for use in the assessment to ensure it is conservative. The second approach was adopted for this assessment which means no additional analysis was required.
- The modeled change in long term average PM_{2.5} concentrations was small enough that it would not be measurable – <0.1 µg/m³. This is why the background level of RCS (1.9 µg/m³) was directly compared to the EPA Victoria guideline for RCS – i.e. 3 µg/m³. Adding less than 0.1 to 1.9 gives 1.9 µg/m³. Both this value and a value of 2 µg/m³ (if 0.1 is added to 1.9) are less than the EPA Victoria guideline of 3 µg/m³ confirming the low risk posed for the residential locations from these activities.

While the submissions provided have indicated concern about the levels of both dust and RCS arising from this project, no specific issues have been raised in the submissions that have not already been covered in the HHRA.

As with any project where dust can be released, implementation of dust control measures in line with that assumed in the air quality modeling will be critical to ensuring the project complies with the air quality and human health assessments.

Limitations

Environmental Risk Sciences has prepared this report for the use of Oats Block Pty Ltd in accordance with the usual care and thoroughness of the consulting profession. It is based on

¹ <https://www.airquality.nsw.gov.au/north-west-slopes/tamworth>



generally accepted practices and standards at the time it was prepared. No other warranty, expressed or implied, is made as to the professional advice included in this report.

It is prepared in accordance with the scope of work and for the purpose outlined in the Section 1 of this report.

The methodology adopted, and sources of information used are outlined in this report. Environmental Risk Sciences has made no independent verification of this information beyond the agreed scope of works and assumes no responsibility for any inaccuracies or omissions. No indications were found that information contained in the reports provided for use in this assessment was false.

This advice was prepared in September 2026 and is based on the information provided and reviewed at that time. Environmental Risk Sciences disclaims responsibility for any changes that may have occurred after this time.

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This report should be read in full. No responsibility is accepted for use of any part of this report in any other context or for any other purpose or by third parties. This report does not purport to give legal advice. Legal advice can only be given by qualified legal practitioners.

References

NSW EPA 2022, *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales*, State of NSW and Environment Protection Authority, <<https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/air/22p3963-approved-methods-for-modelling-and-assessment-of-air-pollutants.pdf>>.

Closure

If you require any additional information, please do not hesitate to contact Jackie on (02) 9614 0297.

Yours sincerely,

Dr Jackie Wright (Fellow ACTRA)
Director/Principal
Environmental Risk Sciences Pty Ltd