



13 November 2025

Our Ref: DOC25/967707

Ms Allison Sharp
Team Leader Assessments - Energy and Resources Open Cut
Department of Planning, Housing and Infrastructure

By email: allison.sharp@planning.nsw.gov.au

RE: Holcim Salt Ash Sand Operations (SSD-9099356) adjacent to Worimi National Park

Dear Ms Sharp,

The Worimi Conservation Lands (WCL) is gazetted and jointly managed under the Aboriginal ownership provisions of the National Parks and Wildlife Act (NPW Act) and is owned by the Worimi people. The WCL Board is responsible for the care, control and management of the WCL in accordance with the NPW Act.

The WCL is an extremely culturally significant landscape to the Worimi people and our priority is to safeguard this special place (Worimi Country). The beach and sand dune system are culturally significant, rich in occupational evidence left behind by our Ancestors that provides unbroken cultural connection and use that has continued by our people since time immemorial.

I write to you regarding Holcim Salt Ash Sand Operations (SSD-9099356) adjacent to the Worimi National Park.

Impacts from sand extraction adjoining the WCL is a real concern and has real impacts in managing our culturally significant lands. It is understood that the proposal will allow dredging to a depth of 28 metres below historic sea levels, and the end point of these operations will be a flooded pit more than 30 metres deep. The Board has serious and very real concerns at the scale of this proposal and its likely impacts on the WCL and its important values.

The Board hold significant concerns about groundwater issues of sea water incursions as well as inundation which poses more of a risk to the WCL and will have flow on effects to our important cultural sites. This incursion will also impact our connection to the spirit corridor that is apart of this Country and that connects us to other Countries.





Worimi Conservation Lands Board of Management
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We also hold serious concerns that the likelihood of PFAS leaking into the WCL, and waterways is a serious and real concern, this will cause irreversible damage to our extremely important sites and cultural connections to our land.

The Board acknowledge the cumulative impact assessment that is now included as part of the Aboriginal Cultural Heritage Assessment Report (ACHAR). We note the ACHAR identifies some concern from the Registered Aboriginal Parties (RAPs) over the report's emphasis of archaeological significance rather than cultural significance, and lack of consideration of the inherent cultural value in the landscape. The Board share these concerns and note this is offensive.

The cultural significance of these lands to the Worimi Aboriginal Owners has been recognised by the establishment of the park, its return to us as Aboriginal Owners and the joint management arrangements help us effectively and successfully manage and protect our culturally significant land. Across Worimi Country impacts occur to Worimi culture. These impacts that occur to the already fragile landscape amplifies how important protecting country is and how significant the park is to the Worimi Aboriginal Owners.

The communication between Holcim and the Board about other matters in the past has been well received and Holcim have expressed a desire to consult and be a good neighbour. Saying that, the Board object to the statement that there have been 'repeated attempts' to contact the Board as claimed in the EIS and now in the Submissions Report. The Submissions Report correctly outlines those attempts: they were limited to July and early August 2021, and then again in July 2025. It is curious that no attempt to contact the Board was made in 2022 before the finalisation of the EIS, nor in the years following the EIS's exhibition in 2023. The Board therefore query whether Holcim is genuine in its offer to meet and consult with the Board.

The Board strongly object the Holcim Salt Ash Sand Operations proposal.

Please note that all formal correspondence to the WCL Board should be sent to wcl.board@environment.nsw.gov.au.

Kind Regards,

Jamie Tarrant
Chair
Worimi Conservation Lands
Board of Management



The Worimi Conservation Lands Board of Management acknowledge the Worimi people, the Traditional Custodians of this land, and pay their respect to Worimi Elders both past and present, and extends that respect to all Australians.



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