

We wish to lodge our **objection** to the Gunlake Quarries Continuation Project (SSD-12469087) - Modification 3 – Western Emplacement proposal, currently on exhibition with the Department, for the following reasons.

Appendix A – Aboriginal Cultural Heritage Assessment

Appendix A contains an abundant 195 pages of documents, which is compiled of the Aboriginal Cultural Heritage report (101 pages including appendices), written (i.e. email communications) and pictorial information. Mundawari Heritage Consultants should be applauded for their thorough and detailed input to the assessment which is far more comprehensive than any previous Aboriginal Heritage Assessments associated with Gunlake Quarries applications. Sadly, it appears artefacts and other significant heritage items may have been lost over time through farming practices and other development however, out of respect for the Gundungurra people, we will make no further comment on the matter.

Appendix B – Biodiversity Development Assessment Report (BDAR)

1.3 Streamlined assessment

'The BAM contains streamlined assessment modules that may be used in specific circumstances. The streamlined assessment module relevant to the proposed development is the streamlined assessment module - small area, which is set out in Appendix C of the BAM. According to the area clearing thresholds set out in Table 12 of Appendix C of the BAM, a development on land with a minimum lot size of 100 ha is eligible to be assessed using the small area streamlined assessment module if the area of clearing does not exceed 3.00 ha. The minimum lot size associated with Lot 13 DP1123374 is 100 ha. The streamlined assessment module for assessment of small areas can be applied to the proposed development as the area of clearing proposed is below the maximum clearing limit of 3.00ha.

The proposed development is therefore assessed using the streamlined assessment module - small area in accordance with the requirements set out in Appendix C of the BAM.'

The proposed development area is purported to be 2.997ha. It appears that if it extended another **0.003ha** or **30 square metres**, or **approx. 2 average double bedrooms**, for instance, there would be the need for a broader assessment than has been carried out for this modification. A clearing of only 2.997ha seems very convenient and fortuitous for Gunlake.

The BDAR states that it is relying on an earlier site visit carried out on 9 December 2024 which classified the area of being of sparse woodland with mostly derived native grassland. It also identified a high proportion (80%) of exotic groundcover, such as Serrated Tussock and Blackberry. Extending the emplacement area will eventually eradicate these noxious weeds through stifling growth and is one way of partially relieving Gunlake of their previously identified widespread weed infestation problem.

It is acknowledged in the report that due to the site being limited to 3.00ha it avoids **'higher quality remnants and areas of Box Gum Woodland CEEC'**. However, what the BDAR does

not reveal is the extent to which the expansion of the emplacement will impact on the woodland to the east of the subject land.

We are concerned as to why the site visit of 9 December 2024 has been used as reference for the current BDAR. We believe that there is a considerable number of large trees on the Gunlake site, which are highly likely to be CEEC woodland trees, that are unexplainably dying or have died. Should this be the case, then that would account for why previous vegetation mapping has been used instead of traversing the site on foot again for this assessment, due to the possibility it may expose any degradation of vegetation since 2024.

To establish whether or not there has been any adverse environmental impacts on the CEEC as a result of quarrying or other activities on site, we believe inspections by appropriate agencies to investigate the cause of any loss of CEEC woodland are warranted.

Waste

The paragraph below titled '5.11 – Waste' has been extracted from the Gunlake Quarries Continuation Project Scoping Report dated December 2020.

5.11 Waste

'The Continuation Project will allow the resource to be used more efficiently, reducing the amount of extracted material that will be added to the emplacements.

No additional waste is expected as part of the application. Current waste management practices on the site will continue to be sufficient for the additional works proposed.'

As stated in the report, the Continuation Project was approved on the basis that it would **reduce** the amount of material to be added to the emplacements yet, less than 3 years since the Continuation Project was approved in March 2023, a modification to **increase** the amount of wastage stored on site has been lodged.

In addition to this, as listed in the Environmental Impact Worksheet of the Continuation Project table titled 'What matters might be impacted?' in the column titled 'Economic' the impact was considered 'unlikely' for the following reason:

'There will be more sustainable use of hard rock resource as a result of Continuation Project, as more lower grade and waste material will be utilised as construction materials'. (page 46)

At no time in any of the reports for the Continuation Project has there been an estimation of just how much waste material is anticipated. Likewise, the height of the emplacement/s nor the limit of the tonnage to be stored have not been stated.

It appears that the lower grade and waste materials are no longer economically viable to Gunlake. The question is, why is Gunlake's waste product no longer utilised as construction materials? Has the quality of the material been overstated or has it been deemed not fit for purpose? Has there been any adjustment to the saleability of Gunlake's aggregate as well? Whatever the reason, Gunlake is now expecting the community to accept their loss of income in the shape of poorer air quality.

Air quality

According to **Item ES6 – Impact Assessment – Air Quality:**

‘The additional disturbance within the modification area would not materially change dust emissions from the Quarry compared to those assessed in the Gunlake Quarry Continuation Project (SSD-12469087) Environmental Impact Statement (EMM 2021) (Continuation Project EIS).’

Further, **Item 6.3 – Other potential impacts – Table 6.1 – Assessment of potential impacts – Air Quality:**

‘The current extent of the Western Emplacement was modelled as part of the Gunlake Quarry Continuation Project (SSD-12469087) Air Quality Impact Assessment (EIS Appendix F.4). The additional area of disturbance within the modification area would be about 2.997 ha, which is about 3% of the Continuation Project disturbance area, and would not reduce distance to sensitive receivers.

The additional disturbance area would not materially change dust emissions from the Quarry or the dispersion modelling results.’

Irrespective of assumed potential impacts from the Continuation Project Air Quality Impact Assessment, the modelling results fail to correspond with the actual impact experienced at our residence which is located approximately 2km south-east of the subject land.

According to the Bureau of Meteorology (BOM) Daily Weather Observations, the highest wind gusts registered at the Goulburn weather station for 2025, to date, are as follows:

- December 2025 (as at 10/12/25) – **W 70 km/h**
- November 2025 – **WNW 94 km/h**
- October 2025 – **W 83 km/h**
- September 2025 – **W 80km/h**
- August 2025 – **NW 91 km/h**
- July 2025 – **W 78 km/h**
- June 2025 – **W 76 km/h**
- May 2025 – **WNW 69 km/h**
- April 2025 – **WSW 63 km/h**
- March 2025 – **NW 76 km/h**
- February 2025 – **SE 69 km/h**
- January 2025 – **SSE 70 km/h**

As you can see from the above information and the screenshot below, taken from the BOM website for the month of December 2025 (as at 3pm of 10 December 2025), the winds are from a predominately **westerly direction**. As previously mentioned, our residence is located SE of the quarry and we are directly impacted by these westerly winds. It is widely accepted that the impact of climate change will increase the frequency of more severe and extreme

weather conditions, thereby the probability of greater adverse air quality impacts on us will be increased also.

Goulburn, New South Wales
December 2025 Daily Weather Observations

Most observations from Goulburn Airport, but some from Goulburn TAFE.

Date	Day	Temps		Max wind gust			9 am					3 pm					
		Min	Max	Dir	Spd	Time	Temp	RH	Cld	Dir	Spd	MSLP	Temp	RH	Cld	Dir	Spd
		°C	°C	km/h		local	°C	%	8 th	km/h		hPa	°C	%	8 th	km/h	
1	Mo	3.5	17.7	WNW	69	14:43	13.5	54	5	W	41	1004.6	15.0	50		WNW	43
2	Tu	2.1	20.0	W	48	16:16	11.2	62	1	WSW	13	1009.9	18.8	33		WNW	20
3	We	2.0	25.0	WNW	43	13:30	14.1	63	1	NW	13	1017.7	23.7	28		WNW	26
4	Th	4.6	29.0	NNW	46	15:21	21.7	35	1	NW	17	1018.4	28.2	21		NNW	20
5	Fr	6.4	33.4	WNW	46	11:16	24.7	24	4	NW	20	1014.1	32.1	14		NW	24
6	Sa	13.5	33.9	WNW	65	16:40	27.3	29	1	NNW	26	1008.3	33.2	17		W	31
7	Su	14.3	24.3	W	70	00:17	15.3	43	3	W	20	1010.1	22.9	13		W	24
8	Mo	12.1	27.2	NW	43	12:17	18.4	59	3	NW	19	1013.0	25.8	24		NW	24
9	Tu	7.0	31.5	WNW	43	13:45	24.8	20	1	W	26	1013.5	30.3	16		WNW	20
10	We	12.8					14.8	88	8	ENE	9	1020.0					
Mean		7.8	26.9				18.6	47	2		20	1013.0	25.6	24			25
Lowest		2.0	17.7				11.2	20	1	ENE	9	1004.6	15.0	13		#	20
Highest		14.3	33.9	W	70		27.3	88	8	W	41	1020.0	33.2	50		WNW	43
Total																	

The impact of dust emissions at our residence has been continually dismissed in Air Quality Assessments for Gunlake as being entirely within approved levels. How can this be when we are consistently exposed to very high winds to the speeds outlined above? We wish to advise the DPIE that not only do we constantly have deposits of fine and/or sandy, gritty dust on outdoor surfaces, but we have also had dust deposits on internal surfaces, such as window sills, furniture and furnishings, ***even when windows are closed***. This has been particularly obvious during the months of November and December 2025 when storm activity was at its highest.

These dust emissions are worrying enough for ourselves at present, but increasingly worrying should the Western Emplacement be expanded. Although the application is seeking an expansion of 2.997ha, there is no indication of how high nor how many cubic metres of **unwanted material** is to be stored on site. Gunlake Quarries may well be in a position of not being able to dispose of their **unwanted material** but neither are we wanting more of their **unwanted material**.

Constant exposure to this level of dust is a significant health hazard, and can lead to respiratory conditions, particularly in the young and elderly, and/or at worst, incurable diseases such as silicosis. We cannot avoid these emissions now so what does the future hold for us and anyone else downwind of the site, especially those in the Betley Park Estate. For the Department to continually approve these adverse impacts is tantamount to casting aside our genuine concerns for our health and wellbeing, as well as those of the Marulan community.

Item 5 – Engagement

‘19 November 2025 – Gunlake sought feedback from Community Consultative Committee (CCC) community members, and Council representatives: Director of Assets and Operations, R. Hughes, and Councillor, B.Kirk. No matters were raised’.

It is interesting that Gunlake uses the language that **‘feedback’** was sought from the Community Consultative Committee (CCC). Once again, we must protest that the CCC **DOES NOT** speak for the wider community. This group of people is not elected by the community but are invitees that do not necessarily represent the community adversely impacted by Gunlake’s operations.

Additionally, according to the Minutes of the Gunlake Quarries’ CCC meeting of 19 November 2025, it was recorded that Geoff Kettle, who holds the paid position of Gunlake’s **Community and Stakeholder Liaison (Engagement) Officer**, was instructed to advise the CCC members of the date this application went ‘live’ on the Department’s Major Projects portal.

One could be forgiven for thinking that advising the community of a pending modification application would primarily be the Liaison Officer’s obligation and, to some extent, a moral obligation by CCC members. There are numerous means of communicating this information to the community, including social media or, indeed, a letter drop by Gunlake, yet none of these methods were employed.

In an article reported in the *‘About Regional’* online newspaper, dated 2 December 2025, (see link below), the following statement was quoted from Gunlake Managing Director, Ed O’Neil.

‘Gunlake Managing Director Ed O’Neil says he is passionate about the local area because it’s been good to his family who have been quarrying for five generations, and good for the 85 mostly local people employed at the Marulan site’.

<https://aboutregional.com.au/gunlake-quarries-fires-up-for-giving-over-the-long-term/492568/>

We find the statement rather amusing as Ed only acknowledges the local area being **‘good to his family’** and **‘good for the 85 mostly local people employed at the Marulan site’**. We are certain that a few words thanking residents directly impacted by Gunlake’s operations, such as dust and greenhouse emissions, noise, traffic and social impacts would have been welcomed but that has never been forthcoming in the past so is unlikely to ever eventuate.

Also contained within the above statement from Ed O'Neil was the fact there has been five generations of O'Neils in the quarrying industry, which began in 1852. Undoubtedly, back then, transportation of product would not have been by B-Doubles, dog and trailers nor tipper trucks but rather via horse and cart. If only that was the mode of transport now because we could collect the 'emissions' from the horses and use them on our garden.

Conclusion

When will enough be enough? Will we be subjected to yet another modification if 2.997ha does not fulfill Gunlake's needs? To date, there has been many aspects of Gunlake's original scoping of the quarry site that have failed to deliver on their expectations. It appears that the site will no longer provide saleable product for the anticipated 30 years of the Continuation Project yet alone the 100 years' worth estimated in 2007 (MP07-0074).

It also appears that Gunlake is unable to go deeper into the pit therefore it stands to reason that they will want to go wider to achieve their goal of 4.2mtpa. If that is the case, then that will further exacerbate adverse impacts on the Marulan community not to mention what will happen to our increasingly endangered flora and the habitats of our native fauna?