



KOALA KOALITION
ECONETWORK PORT STEPHENS INC.

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2/3/2023

Re: Holcim Salt Ash Sand Operations Project Application – DRAFT2

Application No: SSD 9099356

<https://www.planningportal.nsw.gov.au/major-projects/project/39821>

Dear Sir/Madam,

Koala Koalition EcoNetwork Port Stephens (KKEPS) writes to object to this proposal.

Koala Koalition was formed in June 2021 in response to the growing need for a strong voice to advocate for better protection for koalas in Port Stephens and neighbouring LGAs. We aim to protect and grow the koala population in Port Stephens, with the understanding that the koala is a flagship species.

Koala Habitat

The proponent admits that the Koala Habitat Information Base records the site as being within the Port Stephens ARKS (Area of Regional Koala Significance); the definition of which is 20 – 50 % likelihood of Koala occurrence, that the range of habitat suitability on site for koalas is between 50 – 90 % and that the site is comprised of 60 – 70 % suitable feed trees. Previous clearing for mining of the site means that there is little of the habitat remaining intact.

The proponent is not correct in stating that the koala is ‘vulnerable’ in their Biodiversity Impact statement, Appendix C. The koala was listed as Endangered by both State and Commonwealth legislation in 2022. The koala is not, however, the only threatened arboreal mammal to be impacted by this proposal; the Squirrel Glider is also at high risk of extinction as it uses the same kind of forest as koalas. Each Vulnerable Squirrel Glider requires numerous hollows as it uses multiple dens. Other Vulnerable threatened species identified on site include six microbats, four birds, and the New Holland mouse.

We also note the threatened flora species – an orchid, and the proponent’s aim to protect its occurrence.

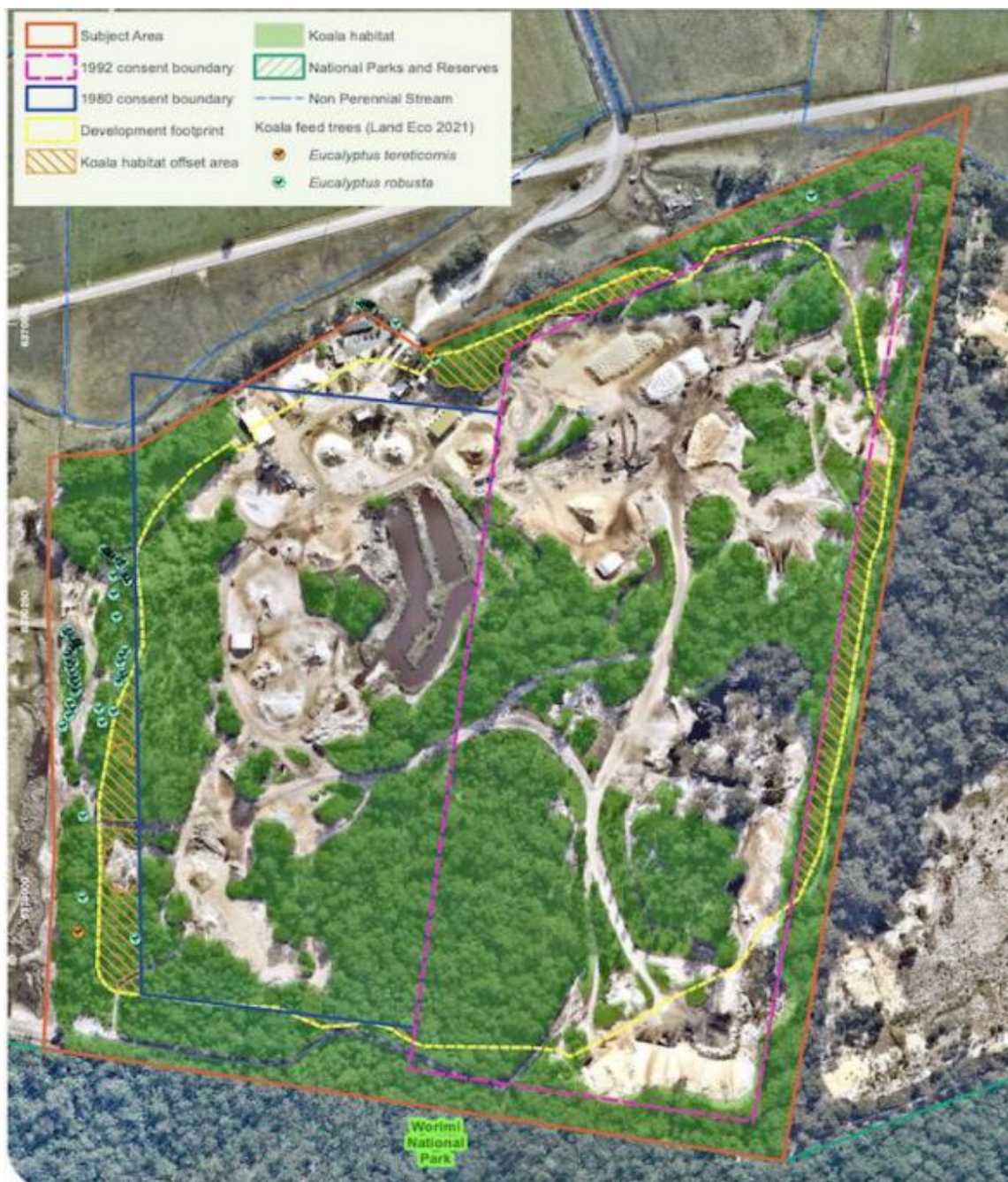
Undisturbed areas

Although the site is identified as supplementary rather than core koala habitat due to previous habitat clearance reducing preferred koala feed trees (PKFTs) to less than 15% of the cover, the number of remaining ‘high, preferred use’ PKFT *E. robusta* (swamp mahogany) in the undisturbed areas is significant and provides

a vital corridor through the several sand mining properties to the Worimi National Park. *E. tereticornis* (forest red gum) is also a Port Stephens PKFT and is located in the same area.

Proposed changes to the current undisturbed boundary area of 30m from south, east and north, to just 10m on north, east and west, will “force” removal of most of the remaining preferred koala food trees (PKFT) identified on the proponent’s following map.

Swamp Mahogany is integral to PCT 1718 that under the BC Act is a listed Endangered Ecological Community (EEC) Swamp sclerophyll forest on coastal floodplains of the NSW North Coast Sydney Basin and Southeast Corner bioregions. It should be retained, not cleared. Why were “no BAM plots ... conducted within the PCT 1718 or PCT 1646 canopy only vegetation zones as neither of these vegetation zones occur within the offset area.” Would additional evidence of Vulnerable species have been detected there?



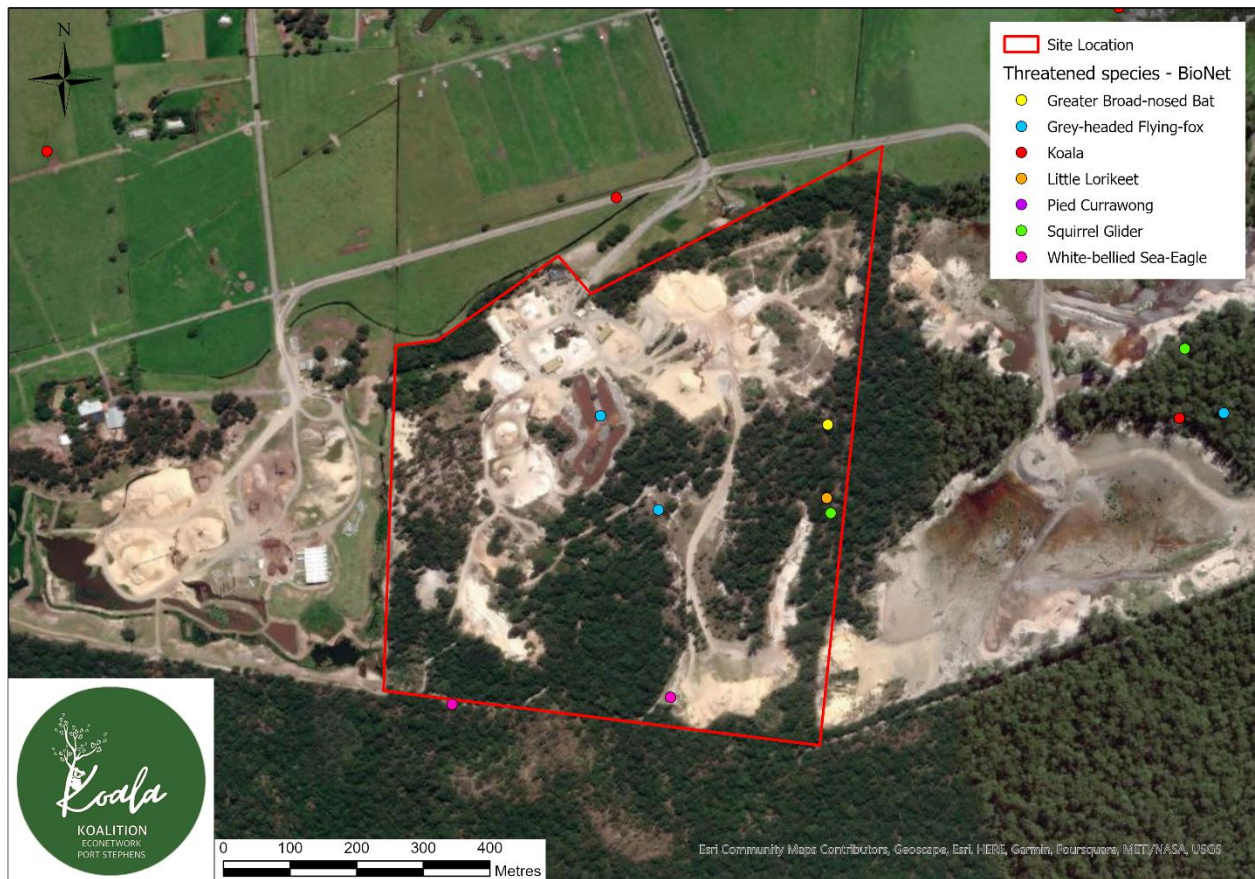
The proponent's map (following) identifies threatened species on site, giving an indication of the importance of retaining wildlife corridors here. The surveys do not give a complete record of where these species move over time.

Increased dust on vegetation due to the proposed increased hours of operation and operating footprint will affect the vulnerable species intake of dust as they feed. The results cannot be mitigated.



Due to the presence of threatened species, KKEPS strongly recommends keeping the level of PKFT cover by not reducing the width of undisturbed boundaries. As there are no identified Biodiversity Offset sites on the Tomaree peninsula, the proponent would most likely merely pay into a fund that has already been investigated by the 2021 NSW Inquiry into the integrity of the NSW Biodiversity Offsets Scheme which found that demand for offset sites is outstripping supply resulting in threatened species being traded away for cash. <https://www.theguardian.com/australia-news/2022/nov/24/nsw-environmental-offsets-scheme-risks-trading-away-threatened-species-for-cash-inquiry-finds>.

While the following KKEPS map drawn from BioNet data shows fewer sightings (it seems the proponent's sightings have not been reported), it does clearly show that koalas are nearby and that other threatened species use the undisturbed areas supporting our claim that their width should not be reduced.



KKEPS does not agree that the clearing of all the vegetation on the block is “unavoidable” as stated by the proponent under the heading ‘Project Impact on Ecological Values’.

Maintaining the undisturbed areas would better ensure the proponent’s stated aim to “not further fragment habitat areas either through the removal of habitat or habitat links or through the imposition of significant threats to Koalas” and to “not reduce Koala connectivity and movement through the landscape.”

KKEPS recommends that buffer zones are not reduced from 30m to 10m. We note the southern boundary has been increased to 50m. Local wildlife corridors should be at least 50m in width, so 10m is significantly short. <https://www.environment.nsw.gov.au/resources/nature/landholderNotes15WildlifeCorridors.pdf>.

Effect on groundwater

The proposed change from dry sand extraction to dredge/wet sand extraction will negatively impact both the quality and quantity of groundwater available to surrounding ecological communities and local residents. The proposed water tanks will not be sufficient to offset additional estimated supply.

The impact on surface and subsurface biota (at the boundary of the site and into the conservation lands from long term groundwater drawdown caused by the dredge pond, has not been addressed.

These underground aquifers are extremely important water assets for the local community and should not be subject to any proposal that could possibly jeopardise them.

Noise and Light Pollution

There will be a significant Noise and Light pollution impact on neighbouring wildlife (and human residents) because of the installation of diesel dredges. This issue has not been addressed in sufficient detail when the proposal is to increase operations to 24 hours per day Monday - Friday. Assurances are merely made that the wildlife will be used to the noise by now.

Wildlife injuries during clearing and operations

The proponent states they intend to contact WIRES if wildlife is injured during clearing. WIRES do not operate in Port Stephens, and do not have a 24/7 rescue line. They should already know how to contact local wildlife rescue groups and I find it distressing that they do not have such a protocol in place.

The statement that fauna is "to be relocated to adjacent areas that would not be further disturbed" by "suitably trained specialists to pre-planned areas" is inappropriate. There are State guidelines about rescuing and releasing native animals that wildlife rescue groups understand and follow.

Operating through the night may increase vehicle injuries on site and moreover on surrounding roads. This proposal will put more pressure on local volunteer wildlife groups.

Rehabilitation

KKEPS has concerns that the rehabilitation plans for the site will not prove to be ecologically viable.

The water may be toxic. The clean fill may not be obtainable, or may also be toxic. It seems ridiculous for the proponent to conclude that the site could be used for ecotourism purposes, clearly assuming water quality impacts are able to be fully mitigated for use by humans and/or wildlife.

Conclusion

The proponent does not pay sufficient attention to avoiding impact by preserving as much habitat as possible. This proposal is all about reaping as much from the land as possible; purely commercial gain. There is no justified need to increase tonnage from this site when another mine has recently commenced on Cabbage Tree Road.

KKEPS requests further information be provided by the proponent on all the matters we have raised of concern in this submission. We recommend that this application not be approved.

I have not made any political donations.

Yours sincerely,

Carmel Northwood, Convenor, KKEPS