

**I oppose this proposal.**

I write this personal submission opposing the ARDG proposal to establish a new quarry in the Wallaroo State Forest adjacent to Italia Road.

I will deal with:

- roads and traffic
  - environmental issues
  - intergenerational equity.
  - lived experience.
  - financial predictions
1. I live at Brandy Hill and use the local road network widely including the roads around Richardson Road interchange, the round-a-bout at Heatherbrae and the Pacific highway continuing to Hexham and onto the M1.

The conditions on all of these roads/highways are already dangerous with severe congestion and a mix of gravel and sand trucks as well as heavy vehicles from the Tomago Aluminium Smelter, all of which have increased significantly over a number of years. Mention of this in any other recent EIS reports are cursory with a “nothing-to-see-here” attitude and the DPE continually approves applications for more sand quarries and rock quarries with no attention to the safety for other road users or the delays that are caused on our road system. In some instances these delays cause financial stress to other road users who need this road network to work efficiently to arrive at work destinations or to businesses on time.

The ARDG/Umwelt EIS has:

- only modelled traffic around the Italia Road and Karuah interchange and not further along the road network.
- has not adequately modelled the cumulative effect of trucks from the quarries in the area, including 3 from Italia Road, 3 from Karuah, Brandy Hill quarry and the 2 quarries from Booral and Deep Creek (both in the planning phase).
- has not included the sand quarry trucks entering the Pacific Highway at Tomago Road in any modelling.
- Has always used the average truck numbers rather than ‘at peak’.
- Has not referred to the congestion on roads prior to and following school or annual holidays/long weekends that will be impacted upon by the large numbers of trucks.
- Has been disingenuous by using truck numbers on the highway with old data (2018) from Taree rather than current data from the Tomago counters.

For residents local to Seaham, Brandy Hill, Wallalong, Woodville and further afield, Italia Road is the preferred route to the Pacific Highway when travelling north. I believe that the truck traffic turning out of and into Italia Road will make this turn more dangerous as cars will have to mix with trucks, at several/minute, along the acceleration lane and beyond. A dangerous mix for me and my family.

2. I object strongly with the quarry being allowed to clear vegetation in a State Forest, to dig a pit that will never be able to be rehabilitated to anywhere near its original state.

*The Project **will result in residual direct impacts** to native vegetation communities and threatened species habitats within the Disturbance Area as a result of vegetation clearing. This includes impacts to the following threatened ecological communities and species: • rusty greenhood (*Pterostylis chaetophora*) • squirrel glider (*Petaurus norfolcensis*) • brush-tailed phascogale (*Phascogale tapoatafa*) • koala (*Phascolarctos cinereus*) • River-flat Eucalypt Forest on Coastal Floodplains of the NSW North Coast, Sydney Basin and South East Corner bioregions endangered ecological community (EEC) as listed under the BC Act (approximately 1.21 ha) Subtropical Coastal Floodplain Forest of the NSW North Coast bioregion EEC as listed under the BC Act (approximately 3.91 ha)*

**The proponents own documents state that the Project will result in residual direct impacts...therefore, the question must be asked:" why has this proposal even been allowed to progress to this stage?"**

*Rehabilitation and Final Landform*

*ARDG is committed to the **effective** rehabilitation ...The overarching objective for the site is that the final landform is safe, stable and non-polluting **having regard to the proposed end land use for the site and surrounding areas....** including rehabilitation of the upper quarry benches and available areas within and surrounding the quarry pit, with **two final voids** (Main Pit and North Pit) **to remain after closure as water storages....** risk profile presented by the final landform and potential access to the site.*

The definition of rehabilitation according to the Oxford Dictionary is: **'the action of restoring something that has been damaged to its former condition.'**

Or: **'...to repair and replace the essential or primary ecosystem structures and functions which have been altered by disturbance.'**

As can be seen from the above quote from the EIS **there is no possibility for the rehabilitation of the site to its former state.** The voids will be a risk to the community and visitors as they will be filled with water and probably need to be fenced in some way for safety. They will never be used for human recreation. Therefore, this section of State Forestry Land will not be able to be accessed by visitors. It will be difficult to provide the kind of soil/growing environment for vegetation on most of the quarry site other than the upper quarry benches mentioned.

In addition to the type of rehabilitation is the exact timing of this.

*The exact timing of individual rehabilitation works will be dependent upon on the rate of resource extraction and **any future plans to seek approval for the continuation of extraction beyond the initial 30-year approval term currently proposed.***

This is a telling point made by the proponent. As with almost every other quarry in the area, after the initial 30-year period requested by proponents, a further EIS is submitted for an extension. As an example, this happened with Brandy Hill quarry and is happening with Boral/Seaham quarry which is finalising its EIS now. This will be an expansion for another 30 years for 2 mtpa. It seems common practice and never in favour of residents who expect that after 30 years the process will be finished.

Stone Ridge Quarry SSD 10432

This is prime habitat for endangered and vulnerable species of flora and fauna. It has been acknowledged as such but dismissed as being close enough to other parts of the State Forest and a National Park.

This is a critical issue. I am not sure if the proponent is prepared to accept that this habitat is crucial to the wildlife corridors that are recognised as important for the survival of endangered species such as koalas, bats, birds etc.

In addition to this, the forestry landscape is part of the character and ambience of the area and used by locals and visitors alike for recreation. Not only is the forest flora and fauna disturbed but the noise, vibration and dust will impact on animals as well as human inhabitants of the area.

*The main environmental impacts associated with the Project are internalised into the production costs of ARDG via mitigation, offset and compensation costs. **Residual local environmental impacts after mitigation, offset and compensation are likely to be immaterial.***

**I find this offensive. It shows no regard for the community and the concerns they have shown. The environmental damage cannot be mitigated and therefore not immaterial.**

3. Our governments, State and Federal are espousing policies to address climate change. However, private industry is still working on a “nothing-to-see-here” basis. With every section of forest removed we reduce the ability of our environment to be able to look after itself. Removal of vegetation changes the way heat is dispersed. Cumulatively in the Italia Road area, the 3 quarries will create about 200 ha of cleared area. This will add to increased dust problems, increased heat and increased run-off during periods of heavy rain events. Already in July 2023 we see the effects of governments globally failing to listen to scientific research and evidence. The northern hemisphere is currently experiencing the worst floods in some areas and excessive heat in others. The general populous worldwide is demanding more from governments to save their lifestyles, in fact their very lives. Australia is not immune to this as we have seen in the past few years with fires and floods unable to be contained. **The destruction of the Stone Ridge Forest will, in some part, contribute to this global warming dilemma and has not been considered.**
4. I believe that use of State Forest for quarrying of the magnitude proposed by ARDG is against the intent for which state forests were created. The majority of the population would not know that ‘below the ground’ can be used for the benefit of private enterprise. Even the spectre of logging has opponents, but at least logged land can be replanted for future generations to enjoy – not so with quarries.
5. State Forestry has signed an agreement with ARDG for a quarry greater than 500,000 tonnes/annum.

*Forestry Corporation of NSW (FCNSW) wishes to advise the Department of Planning Industry & Environment (DPIE) that we are a “willing” partner in the Australian Resource Development Group Pty Ltd (ARDG) Stone Ridge Quarry Project.*

*The project proposes the extraction of **at least 500,000 tonnes** of extractive material per annum over a term of **at least 20 years**.*

**Is it usual for an agreement with such indefinite figures?** ARDG is asking for a quarry which will produce 1.5 million tonnes per annum. That is a huge increase to the number in the original deed.

6. The term “greater than...” is subject to interpretation with no ‘end’ figure. I question the validity of this agreement in law. **Is State Forestry aware of the extent of this quarry? Will ARDG be able to seek an expansion to the 1.5mtpa in the future?**

*“Approximately 49Mt in situ resource...”* **Does this leave open the door for future expansion knowing that the rock seam has been mapped further north within the State Forest?**

The EIS has stated in a letter to Colin Phillips, DPE that there were 6 years of negotiations between the State Forestry Corporation and ARDG :

*FCNSW has been engaged with ARDG in respect to extractive industry resource investigations, for more than 6 years. On 1st November 2018, after an extended period of negotiation and with Ministerial approval, FCNSW and ARDG signed off on a proposal to develop an extractive industry at the Stone Ridge site in Wallaroo State Forest. (22/4/2020)*

**In the interest of transparency, why have these negotiations not been included in the EIS process? It is in the public interest to see how the Forestry Corporation came to this agreement, why the numbers of tonnes and the time frame haven’t been more concrete, and the decision made with respect to environmental consequences.**

**It would also be in the public interest to know whether this will be considered as a ‘stand-alone’ quarry or if the Forestry Corporation would consider expansion or even consideration of another quarry on any adjoining Forestry Corporation land in the future. At the forefront must be the understanding that the Forestry Corporation serves the public interest and public interest may not necessarily be a profit-making concern as this quarry is turning out to be for them.**

7. Intergenerational equity is mentioned in the report as being able to provide infrastructure such as roads and shopping centres for future generations.  
I question this rationale. I can assure you that the young people I know are not concerned about the road infrastructure or the future or the shopping centres. How many young people were questioned during the compilation of this EIS? They are more environmentally wise than past generations. They are concerned for the wellbeing of the planet! And the destruction of habitat that puts our iconic plants and animals at risk. Surely, we should be looking to provide better public transport infrastructure to get cars and trucks off our roads. New road corridors necessitate destruction of more habitat, cause more heat and use up resources that are not infinite.  
Long before the rock is exhausted in the proposed pit for ARDG the company will no doubt lodge an application for an extension to move further along the strata.  
This is happening with the Boral quarry as it has for the Brandy Hill quarry. After that is exhausted... more pits?

This generation seems to have an insatiable appetite for quarry products. Developers and government/councils alike need to tread carefully otherwise we will destroy our environment forever. Everyone rubbished the idea of climate change and yet here we are with the dire consequences of that prediction coming to fruition. The same can be said with the destruction of the natural environment around us. Once lost it can be difficult to get it back. What kind of lunar landscaping are we proposing for the future generations?

*From Applied Environment & Safety: Human health is dependent of ecosystem health. To combat these **emerging global conditions and to protect the lives of future generations**, we need to protect and restore our habitats and biodiversity. In addition, biodiversity loss could be making us sick. (October 2020)*

We are witnessing our part in this global problem. It must be a serious consideration not just the flippant response as given by the proponent.

In Section 3.2 of the Social Assessment Umwelt goes to great lengths to give historic context of community reactions to other quarry proposals in the area. The message from all other quarry communities is the same. NO ONE believes that the benefits outweigh the impacts on people, wildlife and habitat. Umwelt shows all the research but does not respond to it in any way other than 'ticking the box' that the DPE requires. The report states that the creation of 10-15 new jobs trumps any concerns residents, or the wider community, might have.

8. I have lived on Brandy Hill Drive for over 30 years. I have seen the quarry at Brandy Hill expand and change ownership during this time with an understanding that the life of the quarry was proposed to be 30 years. This was the expectation of other residents as well. It came as a shock that Hanson, the most recent owner, applied for an expansion to 1.5mtpa with a life of another 30 years. BHSAG (Brandy Hill/Seaham Action Group) has members that live close to the quarry who have been more exposed to the dust and noise than those residents living further afield. The noise of the crushers is constant and has caused extreme anxiety to some. Some residents up to 5 kilometres away experience the rattling of windows each time there is a blast. And those closest to the quarry experience some blasts that cause their children such anxiety as they are worried that there is actually an earthquake. All residents living along the haulage route must endure the constant noise of trucks – the poor maintenance of some, the noise of braking and the rattling over poorly maintained roads. Shift workers have mentioned sleep disturbance. I mention the 'lived experience' as it is what residents of Balickera will be exposed to and it will be compounded by the cumulative effect of the other 2 quarries – Boral and Eagleton. No mitigation measures will eliminate any of these real issues. It may reduce them in small part, but residents will feel the impact every day of their lives. Not only that, but it will destroy the character of the area they live in.

9. **Financial Rationale.**

*The quarry would also generate long-term revenue to the State through royalties payable on quarry products sold from the site.*

**Is there a conflict of interest for a government department (DPE) to make a decision on this issue when another government entity, such as State Forestry stands to make a profit from the project?**

*...the Project is estimated to provide the following annual direct and indirect annual effects to*

*the local economy: • \$102 M in output (direct and indirect to regional economy). • \$58 M in value-added to regional economy. • \$14 M in gross wages. • 176 jobs (47 direct and 129 indirect).*

**Can figures please be itemised/explained in laymen's terms. For example, show where these jobs actually are? the EIS refers to 10-15 jobs so where are the other 166 jobs likely to be? Etc.**

*Economics A Cost Benefit Analysis of the Project indicated that it would have net production benefits to NSW of \$290 M (present value at 7% discount rate). This estimate includes the costs of water access licences, biodiversity offsets, road intersection upgrades and road pavement maintenance costs. It also includes the costs of mitigation, monitoring and management of other potential impacts.*

**Has a profit projection for ARDG, at current sales rates for the life of the project, been provided for the EIS to give community an indication of the benefits to state v. benefits for ARDG?**

**If not, I, as a member of the community who stands to lose part of an environment that is important to me and someone who has to travel with quarry trucks along the Pacific Highway, want to know why not!**

In summary, is the use of public land/State Forest justified for use of a private company to clear for the extraction of quarry products?

- I believe there are many unanswered questions that I have alluded to in this submission.
- There are also issues of transparency with regard to communications between Forestry Corporation and the proponent.
- Intergenerational equity has not been properly considered.
- Cumulative effect of quarry truck traffic has not been modelled or even referred to south of Italia Road.

Margarete Ritchie.

Brandy Hill.

23 July, 2023.