Re: Public Submission for SSD – 7293, Sancrox Quarry Expansion Project

Thank you for the opportunity to comment on the development proposal.

I wish to formally object to the Sancrox Quarry Expansion project on the following grounds:

- **Clearance of vegetation and significant habitat**
1. **Carbon dioxide emissions**
- the project '*over its entire life cycle is estimated to release approximately 48.4 million tonnes of CO2-e into the atmosphere'* – 2.5 million tonnes less than Sweden's total emissions in 2017[1].
2. **Local tourism and further economic losses due to potential impacts on Koala populations**

Vegetation clearance and fragmentation:

According to the Biodiversity report:

'*Approximately 44ha (44%) native vegetation will remain within the inner assessment circle after clearing for the proposed development and around 411ha (41%) of native vegetation will remain in the outer assessment circle after development*'

Given the recent loss of hundreds of thousands of hectares of significant native flora habitat across the Mid North and North Coasts during the 2019 bushfire season, further damage to remaining vegetation is unjustifiable. Estimates of the number of Koalas lost during the fires in the Port Macquarie area and surrounds are preliminary, but are expected to significantly impact on the continued viability of this population.

Offsets:

The proposed offset site is a mere 49 hectares - not even a 2:1 offset, as required by most projects, particularly those that involve tree planting. Furthermore, of the vegetation associations identified in the project area, two are not included in the proposed offset area and an inadequate amount of a third (Tallowwood -Small-fruited Grey Gum dry grassy open forest).

Of great concern is that the offset will involve planting of trees that will take at least 15-20 years minimum to provide koala feed and hollow-bearing mature trees that provide shelter for many native mammals and birds (75+ years)

Koala Impacts

Koalas are one of the most recognised animals around the world. In a survey conducted by National Geographic the Koala featured in the top five iconic animals along with Elephant, Lion, Whale and Panda. (Source: https://www.koalarecovery.org.au/an-iconic-species/)

The Greater Sancrox Structure Plan (Port Macquarie Hastings Council, 2014), identifies a portion of the land to be cleared as "medium to high activity" koala habitat. The Draft Coastal Koala Plan of Management 2018 (CKPOM) produced by PMHC identifies the area as core koala habitat. The clearing also destroys an identified critical link needed to maintain vegetation connectivity for animal movement.

In 2011 two small areas of high koala activity were located within the development site. In 2013 Koala scats and scratches on tree bark were recorded in the development site. As koala scats decompose over a short period of time, the presence of scats is indicative of recent Koala activity and has been incorrectly described as 'not recent' within the Biodiversity Assessment.

Carbon dioxide emissions

Of major concern is the statement that '*over its entire life cycle is estimated to release approximately 48.4 million tonnes of CO2-e into the atmosphere'* – 2.5 million tonnes less than Sweden's total emissions in 2017[1]. The proponent seeks to contribute greenhouse gas emissions to the atmosphere equivalent to those of an entire country at a time when the planet is warming, and the effects of climate change are affecting all life on earth. The wider impacts of the proposal must be considered in any evaluation of the justifiability of the project.

Local Economic Impacts due to threatening processes to Koalas

Loss of the PM koala population will have detrimental flow-on economic effects – koalas are worth around $50 million to the local economy annually (PMHC Draft Koala Recovery Strategy 2017).

Viable Alternatives to the Quarry

Many examples of sustainable and significantly less harmful alternatives to the project exist. The Hastings region has an important opportunity to contribute to progress and leadership in environmentally sensitive approaches.

Some replicable examples of alternatives to expanding quarrying activities include:

- Downer's $5million asphalt plant in Teralba, NSW - produces thousands of tonnes each year of sustainable road and pavement materials for the Hunter Region and Central Coast (https://www.lakemac.com.au/news/2019/06/05/green-means-go-for-5m-plant)
- Northern Rivers Waste - the first road containing glass sand was constructed in June 2015 at Numulgi and they now use glass sand in much of their road base (https://www.northernriverswaste.com.au/cp_themes/default/page.asp?p=DOC-IVQ-12-05-77)
- Hume City Council (Victoria) - in 2018 soft plastics from approximately 200,000 plastic bags and packaging, and 63,000 glass bottle equivalents were diverted from landfill to construct a Victorian road in an Australian-first trial (https://www.hume.vic.gov.au/About_Us_Contact_Details/Your_Council/Media_Publications_amp_Forms/Media_Releases/Media_Releases_2018/Road_built_with_plastic_bags_and_glass_in_Australian-first)
- Tasmania – in 2018 a Tasmanian council used thousands of recycled glass bottles and plastic bags to build a road south of Hobart (https://mobile.abc.net.au/news/2018-12-11/new-plastic-composite-road-surface-trialled-in-tasmania/10602294)
- Sutherland Shire Council NSW - in 2018 a 250-metre long section was the first in NSW to be made out of plastic bags and glass in a trial of a cutting edge technology that could help tackle

Australia's waste crisis (https://www.smh.com.au/environment/sustainability/plastic-and-glass-road-that-could-help-solve-australia-s-waste-crisis-20180802-p4zv10.html)

Regards

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