



Friends of Grasslands

supporting native grassy ecosystems

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Major Projects Team

NSW Department of Planning, Housing and Infrastructure

Re. Monaro Rock Quarry Project (SSD-27223807)

Friends of Grasslands (**FOG**) is a community group dedicated to the conservation of grassy ecosystems in south-eastern Australia - natural temperate grasslands and grassy woodlands. FOG advocates, educates and advises on matters to do with the conservation of these ecosystems, and carries out surveys and on-ground work. FOG is based in Canberra and its members include professional scientists, landowners, land managers and interested members of the public.

The proponent has advised they are yet to refer this proposal for a decision on whether an approval is required under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth)(**EPBC Act**). Absent a controlled action decision, no-one can know what if any controlling provisions will apply under national environmental law. Requesting comment on this draft Environmental Impact Statement now (**EIS**, 503 pages, with its 1399 pages of consultant studies) seems premature. If the process must be repeated, it will only add to consultation fatigue.

FOG understands rock is needed for the region's development and that the location of the proposed quarry is suited to meeting this need; at the same time, FOG is opposed to this proposal because, if it is approved and proceeds, its integrated form, large scale and lengthy duration will result in serious, irreversible impacts. It will impact First Nations Peoples' heritage, 'develop' (clear) 79 ha of the land surface¹ and leave a large pit in the landscape. For three to four decades it will cause pollution, use a lot of water and intensify heavy vehicle movements around a single point. These threats, and others beyond the proponent's control, compound in the landscape. Nature positive outcomes start with reducing not adding to these threats.

FOG's focus is the ecological impacts which we outline at [Attachment A](#). The land clearing proposed will reduce the extent of a threatened grassy ecological community, abbreviated here as Box Gum Woodland (**BGW**), which is protected at the NSW, ACT and national levels (in each jurisdiction it is critically endangered). The BGW that will remain within the property boundary will almost certainly be indirectly impacted by a substantial alteration to the surface water drainage pattern, and is likely to be impacted by increases in noise, vibration, light and air pollution from particulates especially dust. The loss of 55.39 ha of grassy native forest vegetation will threaten that ecological community. The same direct and indirect impacts will likely cause a long-term decrease in the area of occupancy and in the size of several threatened species' populations (the species are identified in [Attachment A](#)).

FOG notes the proponent concedes some of these impacts will be significant. FOG is concerned other impacts will also be significant due to dust and the alterations proposed to the surface drainage pattern. The absence of plans setting out detailed mitigation and monitoring regimes is notable; it denies the public of an opportunity to examine critical information, reducing the credibility of various claims.

For reasons set out in [Attachment B](#), we found the intensity of the ecological impacts expected from the proposal's dust difficult to discern. FOG is concerned about the sensitivity of small woodland birds

¹ the [Application](#), p. 2

(Attachment A) whose respiratory systems might not tolerate the level of dust anticipated. Given the lengthy duration of emissions, a precautionary approach is needed. High quality information is required.

One thing is crystal clear, FOG would prefer that the entire length of the quarry access road be sealed to prevent avoidable dust impacts. Musing frankly, proposing a project of this nature and scale on partly sealed road appears strategic. Sealing the entire road will not reverse FOG's opposition to this project due to its other serious irreversible, impacts.

Attachment C unpacks our thinking on planned alterations to the surface water drainage pattern. The scale of take will have significant localised impacts all ecosystems and species downstream. We urge that the regulator obtain an expert review of the proponent's claim there is a low likelihood of impacts to groundwater dependent ecosystems.

All our concerns are compounded by what FOG see as an apparent lack of commitment to achieve specific conservation outcomes. For example, the proponent indicates some of the BGW that will remain within the property boundary will not be significantly impacted; however, nowhere does the proponent commit to ensuring that any of the BGW that will remain will retain condition sufficient to continue to be recognised as BGW under the EPBC Act or the *Biodiversity Conservation Act 2016* (NSW).

Offsets

Reiterating our opposition to the proposal, the following assumes it may be approved regardless. On its own, the EIS is not adequate for an assessment under the EPBC Act. That is because the EIS does not propose any offset for the significant impacts that will occur in the ACT² (Attachment A). If these impacts cannot be avoided, they are significant and an offset proposal is required.

Recalling FOG found it difficult to discern the proposal's dust impacts, we question the basis used for determining the offset quantum. The air quality impact assessment contributes to a calculation in the Biodiversity Development Assessment Report. This calculation quantifies the proposal's indirect impacts from all sources (not just dust), i.e., a percentage reduction is applied to biodiversity value generally that exists within specified distances from the unsealed section of the access road and from the extraction, processing, and stockpiling areas.³ We are not aware whether it is a standard practice to assess indirect impacts using this approach. If the approach is valid, then the detail here is vitally important to achieving a nature positive outcome. We urge that all inputs to this calculation are carefully checked.

We have a concern with offset option 1 (of 3) being considered by the proponent, i.e., that the proponent create offset credits themselves, within its property boundary, by establishing a Biodiversity Stewardship Site adjacent to the quarry road and extraction, processing and stockpiling areas. If the project is approved and proceeds, the proponent has already acknowledged the indirect impacts of the proposal will reduce biodiversity values generally throughout this land. Second, while not questioning the proponent's sincerity, their description of themselves⁴ suggests they have little expertise and experience managing high conservation value land.

We would welcome any opportunity to clarify our concerns.

Yours sincerely



Professor Jamie Pittock
President, Friends of Grasslands

19 September 2025

² the [EIS](#), section 6.7.6.4

³ the EIS, [Appendix G](#), the *Biodiversity Development Assessment Report*, p. 7

⁴ the [EIS](#), p. ES-7

Attachment A: FOG's understanding of the impacts of the proposal

In the EIS section 6.7.6.6, the proponent concedes the proposal's residual impacts will be significant on:

BGW recognised as protected under the EPBC Act (critically endangered)

- a reduction by 22.44 ha in the extent of this ecological community in NSW – in sections 6.7.4.3 & 6.7.6.1, these direct impacts are described as impacting PCT3376 Southern Tableland Grassy Box Woodland⁵
- indirect impacts to an additional 5.39 ha of the same ecological community in NSW

a plant

- a reduction in the Area of Occupation for Small Purple-pea by 0.13 ha [BC Act / EPBC Act Endangered]; total of seven plants affected (section 6.7.4.4 & 6.7.6.1)

a bird

- reduction in foraging habitat available to Gang-gang Cockatoo a 48.08 ha [BC Act / EPBC Act Endangered]⁶

an insect

- a reduction in the Area of Occupation by 2.35 ha, and fragmentation that may affect the breeding cycle of a population, of Key's Matchstick Grasshopper [BC Act / EPBC Act Endangered], noting individuals have been confirmed present in an area abutting the mine pit (section 6.7.4.5 & 6.7.6.1).

The proponent suggests the following direct impacts are not significant:

on BGW in the ACT – this will be relevant to consider if this EIS is taken to satisfy assessment requirements for the purposes of the EPBC Act

- direct impacts on (clearance of) 0.67 ha of BGW in the ACT that is recognised under the EPBC Act (critically endangered)
- direct impacts on (clearance of) 1.43 ha of BGW recognised as protected in the ACT under the *Nature Conservation Act 2014* (ACT) (**NC Act**) (critically endangered)
- clearance of an unspecified number of remnant native trees within the road corridor with a Diameter at Breast Height (DBH) >30cm, including several with a DBH >50cm and/or hollows (section 6.7.6.4)
- clearance of an unspecified area of foraging habitat for bird species listed as threatened under the EPBC Act and/or NC Act.

on BGW in NSW

- indirect impacts to an additional 6.94 ha in NSW recognised as BGW under the EPBC Act (in section 6.7.6.6, the total area said to be indirectly impacted is 12.33 ha)

on another ecological community not yet listed as threatened

- clearing of 55.39 ha of PCT3375 Monaro-Queanbeyan Rolling Hills Grassy Forest in NSW (section 6.7.6.1)

on plants

- clearing of 0.56 ha (22.2%) of Pale Pomaderris habitat within the property boundary [EPBC Act Vulnerable]; total of two plants impacted (sections 6.7.4.4, 6.7.6.6 and 6.7.6.1)

⁵ There is a discrepancy between sections 6.7.4.3 & 6.7.6.1 and section 6.7.6.6 of the [EIS](#); in the latter, residual impact said to be "Clearance of 20.56ha of EPBC Act Box-Gum Woodland"; we assume here that sections 6.7.4.3 & 6.7.6.1 are the sections identifying the correct area of EPBC Act Box-Gum Woodland that will be directly impacted.

⁶ There is a discrepancy between sections 6.7.4.5 & 6.7.6.1 and section 6.7.6.6; in the latter, residual impact said to be "Clearance of 47.05ha of Gang-gang Cockatoo foraging habitat"; we assume here that sections 6.7.4.5 & 6.7.6.1 are the sections identifying the correct area of Gang-gang Cockatoo foraging habitat that will be directly impacted.

- clearing of 2.66 ha (2.9%) of Silky Swainson-pea habitat within the property boundary [BC Act Vulnerable]; approximately 1,000 plants (sections 6.7.4.4 & 6.7.6.1)

on a reptile

- clearing of 39.95 ha (10.9%) of Pink-tailed Worm Lizard habitat within the property boundary [BC Act / EPBC Act Vulnerable] (section 6.7.4.5, 6.7.6.6 and 6.7.6.1)

on birds

- indirect impact over an additional 56.58 ha of Gang-gang Cockatoo foraging habitat
- for other woodland birds identified within the property boundary, direct and indirect impacts to the same 104.66 ha of woodland habitat as will be impacted for Gang-gang Cockatoo, affecting
 - Dusky Woodswallow [BC Act Vulnerable]
 - Speckled Warbler [BC Act Vulnerable]
 - Varied Sittella [BC Act Vulnerable]
 - Scarlet Robin [BC Act Vulnerable]
 - Flame Robin [BC Act Vulnerable]) (all section 6.7.4.5 & 6.7.6.1)
- four Latham's Snipe (EPBC Act Vulnerable and Migratory) have been seen within the property boundary and were considered likely to have been foraging and roosting.

Attachment B: The intensity of impacts from dust

FOG found it difficult to discern the intensity of impacts from dust for this proposal for the following reasons:

- No site-specific background air quality data was captured for the detailed air quality impact assessment; instead, data was used from a monitoring station 6.4 km away at Monash in the ACT. The maximum particulate levels cited in the proponent's detailed air quality assessment were captured in April-May 2021 when atmospheric conditions are said to have trapped smoke from residential wood heaters in the Tuggeranong Valley; by contrast, the proposed Project Site is set high in the landscape between two hills. The Monash monitoring station does not capture data for total suspended particulates.⁷ To suggest based on the Monash data that air quality thresholds will be exceeded from time to time at the proposed Project Site seems inappropriate. In our view, site-specific background air quality data should have been collected.
 - Dust deposition data could have been captured at the proposed Project Site at the same time.⁸
 - Particulate standards cited relate to sensitive receptor locations expressed in terms of the size of nearby human populations. FOG is concerned about the sensitivity of some small woodland birds (Attachment A) whose respiratory systems might not tolerate the same level of dust as humans.
 - The proponent "*proposes to* implement an air quality monitoring program which would inform, in real time, management measures to be adopted to minimise particulate emissions at the site to ensure that any additional exceedances would be avoided."⁹ FOG would prefer to see a detailed air quality management and monitoring program published as part of the draft EIS.
 - The proponent indicates the proposal '*is not expected to result in unacceptable impacts*' from air pollutants including dust.¹⁰ In the absence of a detailed air quality management and monitoring program, the basis of this expectation seems inadequate, based on statements like these:
 - "Katestone (2011) provides a summary of dust control measures that *are routinely* considered / applied for open area wind erosion sources."¹¹
 - "Where land is disturbed, various controls *may* be applied to minimise the rate of dust emission through wind erosion."¹²
 - "Typical measures to control dust generation at extractive industrial sites *often include ...*"¹³
 - "The use of a dust shroud when concrete blending at the concrete batching plant, reducing particulate emissions by 70 %"¹⁴
- FOG want to know what specific mitigations will be applied where, how effective they will be, and how much dust will be released into the atmosphere. In the absence of this baseline, the failure to capture 30 per cent of particulates produced may have a significant impact on protected matters like woodland birds.
- A 'Summary of emission reduction methods adopted as part of Project operation' shows the 'control efficiency' for each method.¹⁵ If this is based on 'measures routinely applied', there really is little here to understand the efficiency of the controls proposed. FOG would prefer to see firm commitments based on what is actually proposed, sufficient to give the decision maker (and the public) confidence good environmental outcomes will be achieved.

⁷ the [EIS](#), section 6.2.2.1

⁸ the EIS, [Appendix B](#), the *Monaro Rock Quarry Project - Air Quality Impact Assessment*, p. 117

⁹ Air Quality Impact Assessment n 8, p. iii, italicisation added

¹⁰ the [EIS](#), pp. ES-14 to ES-15, italicisation added

¹¹ Air Quality Impact Assessment n 8, p. 35, italicisation added

¹² Air Quality Impact Assessment n 8, p. 35, italicisation added

¹³ Air Quality Impact Assessment n 8, p. 32, italicisation added

¹⁴ Air Quality Impact Assessment n 8, p. 36

¹⁵ Air Quality Impact Assessment n 8, p. 63

Attachment C: Impacts of planned alterations to the surface water drainage pattern

FOG has read materials related to the 'water balance', to understand the scale of water take.

The proponent asserts rights to harvest (or 'take') 38.71ML, based on a Project Site area of 553ha.¹⁶ This level of take appears significant when viewed alongside: the requirements of persons entitled to take surface water for domestic and stock purposes throughout the entire Murrumbidgee II Water Source catchment (Figure 1), 133 ML/year¹⁷; the estimated volume of surface water available to be shared among users authorised to take water for domestic and stock purposes under access licences across the entire catchment is 25 ML/year¹⁸; and the estimated volume of surface water available to be shared under local water utility access licences from the entire Murrumbidgee II Water Source catchment is 5 ML/year.¹⁹

The proponent notes there is no permanent groundwater flow into creeks on the property meaning "it is unlikely" there are groundwater dependent ecosystems that will be impacted by the proposal.²⁰ This suggests the grassy woodland and grassy forest areas that will not be cleared from the property depend entirely on surface flows. FOG is concerned the proponent does not appear to be considering the need for surface flows into downstream regional ecosystems on and beyond their property.

We note no detailed Surface Water Management Plan been published with the draft EIS.

¹⁶ We note the proponent's [Application](#) lists allotments totaling just 484.7 ha.

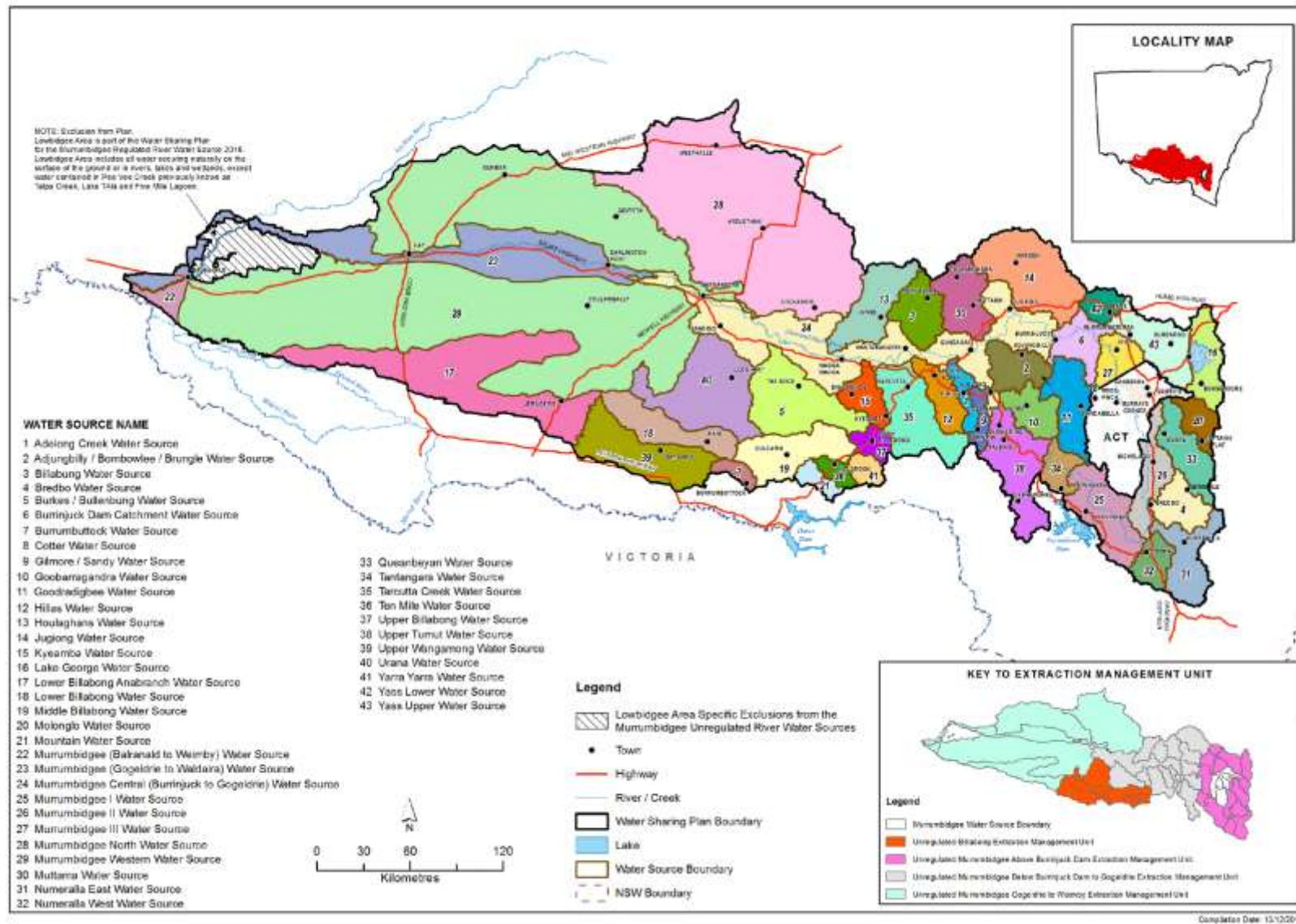
¹⁷ *Water Sharing Plan for the Murrumbidgee Unregulated River Water Sources 2012*, <https://legislation.nsw.gov.au/file/Murrumbidgee-Unregulated-River-WSP.pdf>, viewed 17 Sep 2025, p. 28

¹⁸ *Water Sharing Plan n 17*, p. 31

¹⁹ *Water Sharing Plan n 17*, p. 32

²⁰ the EIS, [Appendix L](#), the *Monaro Rock Quarry Groundwater Impact Assessment*, p. 47

Figure 1: Location and magnitude of Murrumbidgee II Water Source catchment²¹



²¹ Murrumbidgee II Water Source catchment is shaded grey and labelled number 26, map sourced on 17 Sep 2025 here: <https://jade.io/article/sub/284358/2233745/1>