Thank you for the opportunity to participate in this process.

Summary

The proposed Monaro Rock Quarry represents an unacceptable industrial intrusion into the established surrounding communities, posing significant and irreversible harm to the environment, community health, and local amenity. My key objections centre on the threat to my families health, the permanent destruction of a critically endangered ecological community and threatened species habitat, the profound loss of residential amenity due to noise and dust, and up to 500 daily heavy vehicle movements based on flawed traffic data which underestimates the true impact on road safety, and a reduction in the value of my property. These adverse impacts will be borne by an entire generation of the surrounding communities and my children for the 30-year proposed project lifespan.

The project's own Environmental Impact Statement details a range of negative outcomes, including increased heavy vehicle traffic on the Monaro Highway, potential health risks from silica dust, noise and blasting impacts that disrupt community peace, and a likely decrease in local property values. My father-in-law has been diagnosed with terminal silicosis and I do not wish any further family members to suffer the same fate. There is no safe exposure to silica dust as it only takes one instance of exposure, in the same way as asbestosis.

By facilitating large-scale commercial quarrying and associated industrial activity such as concrete recycling and bitumen production without transparent community consultation or proper strategic planning, the proponents are overriding the environmental, social, and recreational values that communities attach to their local forest estates. These estates hold far greater long-term value to the community as an intact ecological, recreational, and cultural asset than as a depleted quarry void that generated only 30 direct jobs in its lifetime.

Furthermore, the planning process imposes an unfair burden on the community, creating an inequality where volunteers are expected to respond to thousands of pages of complex technical documents within an inadequate 28-day timeframe, which fundamentally undermines genuine consultation. Only residents of Royalla were notified but those outside the immediate area were not. Our property will be affected by the quarry but we were only notified by resident volunteers much later.

The target resource rhyodacitic ignimbrite identified in Section 3.3 of the project’s EIS is found all the way between Canberra and Cooma and in many other locations in Australia. There are far more appropriate and safer locations to locate this project without risking the health and amenity of thousands of residents in the surrounding suburbs that are both rural and urban who receive no benefit.

The reason to site the project in the proposed location is solely to the benefit of the proponent in the form of reduced costs of transport. Refer to Section 6 for the geological map of the region and the prevalence of the target resource elsewhere. The existing quarries in the region (Cooma Road Queanbeyan and Heidelberg) are not operating at full capacity now and the question must be asked why another quarry is needed. Old Cooma Road is subjected to 190 truck movements on average per day already from the existing quarry (refer https://www.holcim.com.au/cooma-road) and the proponent seeks to use Old Cooma Road during both the construction phase for heavy vehicular traffic and for a proportion of the ongoing operational traffic. Heidelberg’s quarry at Michelago provides no data on vehicle movement but must add some additional traffic to the Monaro Highway.

1. Severe and Unacceptable Residential Disamenity

The project as proposed by Monaro Rock will introduce industrial-scale activities into long-established rural and urban residential communities, fundamentally and negatively altering the areas character and the residents' way of life.

- **Degradation of Rural Amenity and Lifestyle:** The Social Impact Assessment (SIA) acknowledges the community's strong connection to its rural lifestyle, which is characterised by peace, quiet, and a sense of place. The introduction of a major quarry with daily heavy industrial noise, blasting, and a constant stream of heavy vehicles will destroy the very amenity that defines my community. While the applicant has designed the project to attempt to meet regulatory noise and dust criteria most of the time, the SIA acknowledges that these industrial intrusions will still disrupt the enjoyment of my property, and cause stress and anxiety.
- **Adverse Impact on Property Values:** The proposed quarry will negatively impact the value of my residential property. While the applicant's SIA acknowledges this concern, it fails to adequately quantify or mitigate it, shifting the financial burden onto local landowners such as myself. Studies worldwide consistently demonstrate a significant devaluation of properties located near operational rock quarries, with awareness of such a disamenity leading to price reductions of up to 20% based on proximity. This loss in property value directly reflects the deterioration in the area's quality of life caused by the quarry. Consequently, homeowners will experience a reduction in homeowner equity, regardless of whether they sell their property, as the adverse effects on quality of life necessitate a lower asking price. Furthermore, the overall property values for the local areas will decrease due to the influence of comparable sales, affecting all residents.
- **Other heavy industry use:** This project was initially proposed as a rock quarry. It has now expanded to include the production of concrete and bitumen, and concrete recycling. This increased scope of industrialisation may open the door to other heavy use industrial projects.
- **Unacceptable Noise and Blasting Intrusion:** We will be subjected to blasting between 9:00 am and 5:00 pm. While noise and vibration levels are modelled to be within regulatory limits, the SIA acknowledges this will disrupt the community's peaceful enjoyment of their properties and cause stress. The constant presence of industrial noise represents a significant loss of amenity that cannot be fully mitigated.

2. Irreversible Environmental Impacts on Flora and Fauna

The project will cause significant and irreversible harm to nationally and state-listed threatened species and ecological communities, as detailed in the applicant's own Biodiversity Development Assessment Report (BDAR). This clearing represents a direct and permanent loss of habitat that is part of the local ecosystem for these species.

- **Destruction of a Critically Endangered Ecological Community:** The project will directly clear 22.44 hectares of Box-Gum Woodland, which is listed as a critically endangered ecological community under both NSW and Commonwealth law. This impact is classified as a potential **"Serious and Irreversible Impact" (SAII)**, meaning its loss cannot be fully compensated by offsets.

- **Destruction of Threatened Species Habitat:** The quarry will destroy known habitat for numerous threatened flora and fauna species. Key impacts include:
    - Pink-tailed Worm-lizard (*Aprasia parapulchella*): The project will clear 39.95 hectares suitable habitat for this vulnerable species. This species is of such high conservation concern that a $1 million multi-agency fund was established to protect it at nearby Googong.
    - Key's Matchstick Grasshopper (*Keyacris scurra*): The project will directly destroy 2.35 hectares of habitat, representing a significant 76.3% of the identified habitat on the property for this endangered insect.
    - Gang-gang Cockatoo (*Callocephalon fimbriatum*): The project will clear 48.08 hectares of foraging habitat for this endangered bird.

3. Flawed Traffic Estimation Process Due to COVID-19 Impacts

The applicant's traffic assessment is based on data that does not represent typical or peak conditions on the Monaro Highway, leading to a potential underestimation of the project's true impact on road safety and network efficiency.

- **Surveys Conducted During Atypical Conditions:** The traffic surveys were conducted between 24 May and 9 June 2021. While this was before the major NSW lockdown at the end of June 2021, it was a period affected by other COVID-19 related travel disruptions.
    - During the survey period, multiple states, including WA, SA, QLD, and the ACT, had various border restrictions or quarantine requirements in place for travellers from Victoria. While NSW did not have a hard border, restrictions on entry from Greater Melbourne were in place. These factors would have artificially suppressed the volume of long-distance holiday and business traffic on the Monaro Highway compared to normal conditions.
- **Timing Did Not Capture Peak Ski Season Traffic:** The survey period coincided with the opening of the NSW ski season on June 4, 2021. However, this was the very beginning of the season. Peak ski traffic on the Monaro Highway, a principal route to the snowfields, typically occurs later, especially during school holidays. The data collected therefore fails to capture the highest seasonal peak traffic flows, meaning the baseline traffic volumes used in the assessment are likely to be significantly lower than those experienced under normal, unrestricted peak holiday conditions.
- **Suburban Impact:** The proposed traffic flows whether via the Monaro Highway or Old Cooma Road will impact the suburbs along the route and where they enter the residential areas of Calwell, Theodore, Richardson and Googong. Googong is planned to more than double in size from the current population of 8,000 to 18,000 by 2035. We and other locals travel along these roads every day and the additional movements of heavy vehicles along these dual-lane rural roads will degrade the road surface and reduce the safety of my family and the other residents.
    - The Queanbeyan-Palerang Regional Council (QPRC) had to apply for a Special Rate Variation (SRV), resulting in an 18% increase in general rates each year for three years, commencing from July 1, 2023, to fund infrastructure in the region.

    - The addition of the 500 heavy vehicle movements plus the quarry construction equipment to these dual-lane rural roads will further degrade these roads and require further council maintenance and expenditure which has not been captured in the projects cost benefit analysis. This will then further force up council rates for all the ratepayers in the region, throughout the proposed 30 year lifespan of the site.
- **The EIS states that 500 truck movements will occur each day**: The proposed operating hours are between 5am to 6pm, resulting in a large truck passing over the same road surface once every 1.3 minutes, including peak ski season when conditions are poor. The Monaro Highway is already the only route to the Snowy Mountains region and heavily used by freight and logging trucks, plus holiday and residential traffic. It is a road that due to the environmental conditions is often subject to heavy fog. My son competes at a State level in cycling and we use our local roads, along with the local Canberra Cycling Club and Vikings Cycling Club, every day for training activities. We will not feel safe to ride on these roads being overtaken by a large truck at an increased frequency of one every 1.3 minutes.
- **Hours of operation intersect with peak travel periods:** The projects operating hours include the key business and trading hours during which most people would expect to conduct shopping and other trips to town from rural properties and communities along Old Cooma Road and the Monaro Highway, and school bus drop off and pickups for children. These are the only routes into and out of Canberra and will be heavily utilised.
    - the proposed road haulage movements for 11 hours per day 6 days per week for 30 years, plus the construction period, is inconsistent with the maintenance of rural amenity, social connection and community cohesion.

4. Unfair Community Consultation Process

Expecting volunteer community members to read, understand, and formulate a detailed, evidence-based response to a large and complex set of technical documents within a 28-day public exhibition period is a significant and unfair challenge. This creates a profound "inequality of arms" between the well-resourced applicant and the community.

- **The Sheer Volume and Complexity of Technical Information:** The applicant has produced a voluminous Environmental Impact Statement (EIS) supported by 14 specialist consultant studies. These documents cover highly technical fields such as hydrogeological modelling (MODFLOW-6), air dispersion modelling (CALPUFF), and biodiversity assessment (BAM). Understanding, let alone critiquing, these reports require a level of scientific, legal, and planning expertise that volunteer residents cannot reasonably be expected to possess or source within 28 days.
- **Inequality of Resources: Time, Expertise, and Funding:** The applicant is a commercial entity with the financial capacity to engage a team of paid experts over several years to prepare the EIS. In contrast, community members are volunteers who must review these documents in their personal time, without the funds to commission their own independent expert peer reviews of the applicant's technical reports. This creates a significant power imbalance where the community's concerns, even if valid, may be dismissed as lacking the rigorous and comprehensive body of high-quality supporting evidence expected by decision-makers. This creates a significant power imbalance, as noted in the applicant's own SIA.

- **The High Burden of Proof on Objectors:** The above demonstrates the high burden of proof placed on objectors wherein a successful challenge requires objectors to identify specific technical deficiencies—a task that is exceptionally difficult without equivalent expert support. The process places an unreasonable expectation on the community to counter the applicant's claims.
- We personally were only made aware through Facebook of this enterprise 14 days before the close of submission, as to our knowledge only residents of Royalla in NSW were notified.

5. Impacts to Health

Particle pollution is the most significant air quality problem in the nearby ACT. High levels of pollution are associated with respiratory and cardiovascular illness. Current research indicates that there is no level of particulate matter (PM) at which health impacts do not occur. The assessment's modelling predicts one additional day of exceeding the 24-hour PM2.5 safety standard. Overall, the proponent's proposal found that the quarry will rely solely on dust control measures to attain a minimum of one day of failing the safe standard.

- **In the nearby Tuggeranong valley in the ACT, there were 31 exceedances of the PM2.5 standard between 2015 and 2018:** The project EIS itself estimates that the quarry will add at least one additional day of PM2.5 safety failures to the local areas. In winter the prevailing strong wind is from the south which will blow the particulate matter from the quarry into the Tuggeranong Valley. In summer the prevailing winds are from the north west which will transport particulate matter directly onto my property and the areas of Royalla, Fernleigh Park, Mount Pleasant, Mount Campbell Estate and Burra.
- **Air quality is primarily of concern in areas with high concentrations of population, transport and industrial activities:** Localised air quality problems have the potential to cause adverse health impacts. This project is increasing the concentration of pollution generating activity via 500 truck movements each day and industrial activities associated with the quarry, including the generation of respirable crystalline silica (RCS) and fine particulate matter (PM2.5) generated during extraction and processing. The proponents Environmental Impact Statement acknowledges that the rock to be quarried contains 30-40% quartz, the source of RCS dust. There is no recognised safe level of ingestion for RCS. The areas climactic conditions of low average humidity and dry conditions aid the spread of silica dust as they allow smaller silica particles to remain suspended in the air for longer periods, increasing the risk of exposure and the potential for health issues like silicosis. This combined with any windy conditions will increase the likelihood of spread of silica dust.
- **My father-in-law is already diagnosed with terminal silicosis:** He has stated that it feels like he is slowly drowning every moment of every day and is forced to use oxygen to perform the most basic of daily tasks. He is limited to the extreme, as he cannot go out without fear of catching even the common cold resulting in hospitalisation and death. My children's access to see their grandfather is limited as if they exhibit the slightest symptoms of sickness we cannot visit. I have no desire for any more members of my family to suffer in the same way due to short sighted industrial activity in the wrong location. My father-in-law is just one many as research estimates that over 83,000 future silicosis cases and around 10,000 future lung cancer cases will arise from past and ongoing exposure to RCS, with the full toll

not yet understood due to the disease's delayed onset. We only have to look at the most recent cases in Sydney where silica dust suppression and safety measures were supposed to be instigated by the companies involved. Silica dust levels were supposedly being monitored and yet as of March 2025, 13 workers have already been diagnosed with the condition. Are we supposed to trust that our health and safety will be diligently monitored by Monaro Rock Quarries?

6. Alternate Locations for the Site and the Target Resource

The proponent EIS indicates that the target resource is rhyodacitic ignimbrite. The EIS itself states that the Deakin Volcanics are a southwest-dipping sequence of the target resource, which extends down to Cooma beneath the Monaro Highway. As can be seen below in the geological survey for the region (sourced from https://espade.environment.nsw.gov.au/#) the Deakin Volcanics containing the target resource extends down to Cooma beneath the general route of the Monaro Highway. There is significant opportunity to extract the target resource from alternate areas where the impact on surrounding environments and communities would be significantly less.