

## **Submission regarding butterfly hill-topping: Monaro Rock Quarry**

To: NSW Department of Planning, Housing & Infrastructure / Monaro Rock Pty Ltd

Subject: Butterfly Hill-Topping Concerns – Monaro Rock Quarry Proposal

Dear Assessment Panel,

I am writing as a concerned community member regarding the potential impacts of the proposed Monaro Rock Quarry on hill-topping behaviour and hill-topping sites used by butterflies in the Royalla region. I could not find it addressed in EIS thus I propose the following following:

1. Conduct field surveys during peak butterfly mating/flight seasons to detect hill-topping behaviour, including monitoring ridgelines, rocky outcrops and other topographic perches, not just general habitat or vegetation surveys.
2. Identify any existing hill-topping sites (even very small perches <10 m<sup>2</sup>) that lie within or adjacent to the proposed extraction or associated infrastructure footprint, map their exact locations, and treat them as critical biodiversity assets.
3. Where hill-topping sites are identified, require the proponent to redesign the layout or operations to avoid those sites entirely — include buffer zones with no disturbance, no light spill, minimal noise/dust exposure.
4. Include monitoring programs specific to hill-topping butterflies: baseline monitoring, monitoring during construction, then post-construction and during rehabilitation, over multiple years, with clear trigger points (e.g. if hill-topping is observed during works, pausing works until mitigation or redesign is implemented).
5. Ensure offsets or stewardship actions protect equivalent or better hill-topping sites in perpetuity, close in location (so that connectivity is maintained), and with legal enforceability.
6. Make public the relevant parts of the EIS / BDAR that cover butterflies and hill-topping behaviour (including survey data, maps, monitoring plans) so stakeholders can verify that significant hill-topping resources are not being overlooked or allowed to be lost.

These steps are required because hill-topping behaviour is highly site-specific and small topographic or visual changes can render a site unusable, producing local population declines that are not fixed by generic offsets.

Refer:

[www.environment.nsw.gov.au/topics/animals-and-plants/threatened-species/nsw-threatened-species-scientific-committee/determinations/final-determinations/2000-2003/loss-and-or-degradation-of-sites-hill-topping-by-butterflies-key-threatening-process-listing](http://www.environment.nsw.gov.au/topics/animals-and-plants/threatened-species/nsw-threatened-species-scientific-committee/determinations/final-determinations/2000-2003/loss-and-or-degradation-of-sites-hill-topping-by-butterflies-key-threatening-process-listing)

[https://envcomm.act.gov.au/wp-content/uploads/2020/08/Butterfly-Accounts-ACT\\_Final.pdf](https://envcomm.act.gov.au/wp-content/uploads/2020/08/Butterfly-Accounts-ACT_Final.pdf)

Yours sincerely,

Royalla Resident

24 September 2025