I wish to state my objection to the modification of the sandmining project DA 195-8-2004 MOD 2 currently being proposed by Boral Resources NSW.

Although it is stated that the new areas proposed are adjacent to the existing project they have considerably different environmental considerations. These differences are so substantial that the proposed project should be applied for and assessed in its own right. It is rightfully not just a modification and it should not be being dealt with through section 75W of the NSW Environmental Planning and Assessment Act 1979.

The proximity of the decommissioned Minnamurra tip to Area 5A has not been sufficiently addressed. Interfering with the aquifer in this location is very likely to increase the spread of contaminated groundwater from the old tip site, causing it to travel in unexpected ways towards neighbouring water bodies, devastating the ecological communities they support.

The impact on the ecology of Area 5B is significant. Bangalay Sand Forest is an endangered ecological community with 4.53 Ha of this community including 12 hollow bearing trees being proposed for removal. All remaining examples of this community are biodiverse by necessity and retaining the habitat they provide and the tree hollows that support breeding birds and animals should be a priority. There is a particular community pride in the nesting site of sea eagles known to be in this stand of Bangalay forest.

The alteration in local hydrology that sandmining will generate will also impact the health of adjacent Bangalay Forest. All of the ecological impacts of this proposal seem to be inconsistent with the necessity for coastal wetlands and littoral rainforests to be protected in their natural state, including their biological diversity and ecosystem integrity as specified by the Coastal Management Act 2016.

The fact that this proposal does little to protect and doesn't even propose any offsetting is a big concern to me. Providing habitat boxes further south is a poor alternative and one that is known not to be accepted by many species.

I ask that that this project cease being considered as a modification of an existing activity and that a full investigation is carried out as a new approval, with intense scrutiny of the impacts of the project on hydrology and ecology.