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Submitted online

Dear Melissa

Re: Bobs Farm Sand Mine Project (SSD 6395) - Environmental Impact Statement

Thank you for the opportunity to comment.

The number and size of the documents provided for comment are such that I am not in the position to address them all. Therefore the lack of comment on aspects of the document does not automatically indicate support for statements made.

I am totally opposed to this sand mine proposal for the reasons outlined below.

Coastal forests such as the one on this land are becoming increasingly fragmented and rare along the east coast of NSW, so this plan to destroy them for a non-sustainable activity such as sand extraction for short term gain by a commercial company is clearly inappropriate.

The EIS acknowledges the presence of threatened species and ecological communities. Their conclusion, based on field studies that could not be described as comprehensive, is that the overall contribution of these threats to listed species and ecological communities is generally low and unlikely to substantially cause local extinctions.

However, the Ecological Assessment in the EIS Volume 1 states on page 66 that "A total of 1217 habitat (hollow-bearing) trees were identified within the study area... Many of these trees were considered to be significant as a result of their very large size as well as the variety and number of hollows they contained." The assessment further admits that "The proposal will result in a significant loss of habitat for a number of the addressed species particularly species such as *P. norfolcensis*."

This is not only inappropriate but outrageous in this day and age when ignorance is not an excuse for destroying the environment. The forests in our Port Stephens area contain an abundance of species, including threatened fauna and flora as listed in the comprehensive Wildthing Environmental Consultants Report 2013.

Has a population viability analysis (PVA) been undertaken to predict the survival of threatened species? Without this and further detailed studies, evaluating conclusions for this mine development is impossible. The future of not only the

species on this site but adjacent populations in Port Stephens is at risk where wildlife movements may be affected and therefore breeding opportunities.

The EIS Ecological Assessment concludes "However, taking into consideration the relatively large amount of similar habitat in the local area and given the recommendations the proposal is unlikely to disrupt the life cycle the addressed threatened species such that local extinction would occur." It is impossible to back up this statement through such limited surveys and it is made entirely to protect the proponent. This misguided rationale of there being similar habitat nearby is yet another example of how increasing development and extraction industries chip away at already fragmented forests from all sides. Furthermore it would be a significant change of land use. You can't just expect animals to move next door - would your neighbours let you move in permanently if your house was bulldozed?

The NSW National Parks and Wildlife Service Conservation Management Notes state that hollow formation takes upwards of 100 years. In south east Australia the species using hollows includes some 17% of bird species, 42% of mammals and 28% of reptiles (Gibbons and Lindenmayer 1997). They include bats, gliders, owls, cockatoos, parrots and many other species found in the Bobs Farm locality. "Any decrease in the availability and natural diversity of hollows can lead to significant loss of hollow-dependent animal species diversity and abundance and in some cases may result in local extinction of these species."

Not only are old trees irreplaceable, the band aid solution of placing artificial nesting boxes in the vicinity takes time for occupancy to occur - what happens to any survivors in the meantime? Habitat fragmentation will cause immediate alterations including habitat loss and reduction of prey species such as gliders and frogs for the powerful owl and spotted tailed quoll.

Most ecologists will tell you that fragmentation and encroachment into large or small pockets of habitat will inevitably lead to local population crashes, contributing to state and even nationwide extinctions. We are currently witnessing this in our lifetime with the rapid decline of species such as spotted-tailed quolls, grey-headed flying foxes, glider spp, koalas, powerful owls and numerous others. The spotted tailed quoll (tiger quoll) is now listed as Endangered under Commonwealth legislation and Vulnerable in NSW. However, records indicate it still exists in Port Stephens. Surely we cannot allow this carnivorous marsupial to become extinct as did the Thylacine? The grey-headed flying fox and koala are also listed under the EPBC Act - their status is Vulnerable.

I commend the detail in the Ecological Assessment but not many of the statements or conclusions drawn. For example, that there is "...relatively large amount of similar habitat along Stockton Bight." Offsets proposals are inadequate as are mitigating measures and potential indirect impacts. Just because a particular species was not seen during these surveys doesn't mean they don't use that area at

other times. Wildlife is notoriously difficult to observe and the time of year needs to be taken into account too.

Too many sand mines have already been approved in Port Stephens. It is not seen as a sustainable industry by most locals or tourists and such a conflict of land use is inappropriate in this area. It astounds me that in this day and age, a mining project of this size would even be considered in an area known for its astounding natural beauty, flourishing tourism economy and adjacent to a single access transport corridor already suffering a high road toll. It is at odds with many State and Local Government initiatives such as tourist development, koala protection and issues over water quality.

There are so many questions that need to be answered by the proponent and so much further survey work required, that I suggest it would be better to find a less environmentally significant site or abandoned cleared land somewhere else. Huge knowledge gaps about flora, fauna and the potential future impact of the proposed mine exist and are recognised by the proponent. With this significant change of land use, threatening processes are likely to increase during the life of this sand mine.

Under these circumstances, when the proponent's EIS freely admits that many outcomes are unknown, the precautionary principle should be applied. Approval for this development should therefore be denied.

As the local habitat supports several nationally threatened species and is a matter of environmental significance, it should be referred to the Commonwealth and be addressed by the Minister for the Environment and Energy under the conditions of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act).

Yours Sincerely

<name withheld on request>

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