

Submission against the Sancrox Quarry Expansion

I wish to make a formal objection to the proposed Sancrox Quarry Expansion.

- **Loss of Koala habitat.**

The recent catastrophic bushfires in NSW have resulted in the loss of hundreds of thousands of hectares of bushland habitat and hundreds of koalas. Injured and now homeless koalas may migrate to, or have to be moved onto, the proposed development site. It is unbelievable that proponent wishes to clear a viable patch of intact koala habitat when so much habitat in the region has been recently lost to fire. The Greater Sancrox Structure Plan (Port Macquarie Hastings Council, 2014), identifies a portion of the the land to be cleared as medium to high activity koala habitat. The Urban Growth Management Strategy 2017-2036 (PMHC 2017) classifies the area as a 'medium biodiversity asset/constraint' and identifies that the site could provide a 'major conceptual habitat link'. The Draft Coastal Koala Plan of Management 2018 (CKPOM) produced by PMHC identifies the area as core koala habitat. The clearing also destroys an identified critical link needed to maintain vegetation connectivity for animal movement. In NSW, the Biodiversity Assessment Method (BAM) is the standard method used by accredited assessors to assess impacts on biodiversity at development sites. Under the BAM, koalas are currently an 'Ecosystem Credit Species'. This means that they can be offset in any compatible ecosystem**.

Native Vegetation Clearance

The proposed Sancrox Quarry Expansion will involve the 'clearing 43.1 hectares of native forest vegetation, 0.55 ha of which is identified as the threatened ecological community Subtropical Coastal Floodplain Forest (NR117)'. The clearing will result in serious and irreversible environmental impacts at both local and regional scales.

According to the Biodiversity report:

'Approximately 44ha (44%) native vegetation will remain within the inner assessment circle after clearing for the proposed development and around 411ha (41%) of native vegetation will remain in the outer assessment circle after development'

One can therefore conclude that 56% of native vegetation within a 100ha buffer of the centroid of the project area and 59% of vegetation within a 1000ha buffer of the centroid of the project area will be cleared. The Biodiversity Report has not considered the cumulative impact of vegetation clearance within a regional context and the continued fragmentation of remaining vegetation across the landscape. This project is yet another example of how biodiversity in the region is suffering 'death by 1000 cuts'.

Threatened Species and Koala Activity

Seven threatened bat species were detected in the fauna survey and an additional 23 'ecosystem credit' threatened fauna species were predicted to occur by the Biodiversity Assessment Credit Calculator. Unbelievably, however the BA Credit Calculator did not predict the Koala to occur in the area, despite the presence of PCT 1265 (Tallowood -Small-fruited Grey Gum dry grassy open forest) – a trigger for the generation of koala 'ecosystem credits'. Why?

In 2011 - two small areas of high koala activity were located within the development site. In 2013 - Koala scats and scratches on tree bark were recorded in the development site. As koala scats decompose over a short period of time, the presence of scats is indicative of recent Koala activity and has been incorrectly described as 'not recent' within the Biodiversity Assessment.

Offset Strategy and Suitability of Proposed Offset Koalas are already at risk of functional extinction. Offsetting does not increase populations. The offset will be secured either through purchasing and retirement of 2,449 ecosystem credits from the credit market (with some ecosystem credits to be generated by potential offset lands within the study area) or payment of an equivalent monetary value into the recently established Biodiversity Conservation Fund. Offsetting at a State level via payment into a fund has several issues:

1. Genetic diversity: the importance of different genomes for koalas is widely understood for disease resistance. Removal of koala habitat, and therefore likely destruction of local populations, results in a failure to protect genomes in areas of high development pressure.
2. Resistance to Climate Change: research has predicted that koalas on the coastal floodplain will be much more resistant to climate change than koalas in other areas (eg western NSW). The viability of coastal populations is much higher than western populations.
3. Community Value: Our community greatly value their koalas and do not want to see them offset away from the Port-Macquarie Hastings region.

The proposed offset site is a mere 49 hectares. Of the vegetation associations identified in the project area, two are not included in the proposed offset area. According to the Biodiversity Assessment 'there are stands of Swamp Mahogany swamp forest and paperbark swamp forest in the proposed offset site, however no such vegetation occurs within the Development Site'. Within the Port Macquarie Hastings LGA paperbark is not considered a primary or secondary koala food tree species

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The removal of Spotted Gum (winter flowering), Grey Ironbark (winter, spring and summer flowering), Blackbutt (spring - summer flowering) and Pink Bloodwood (summer - autumn flowering) species from the local area will result in the loss of crucial winter and autumn flowering species. Paying into a fund will not compensate the fauna of the local area for the loss of valuable feed species.

Carbon Emissions

The project 'over its entire life cycle is estimated to release approximately 48.4 million tonnes of CO₂-e into the atmosphere' – 2.5 million tonnes less than Sweden's total emissions in 2017

(https://aus01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fen.wikipedia.org%2F...%2FList_of_countries_by_carbon&data=02%7C01%7C%7C4bf768473b8843c7cdd108d77e13a98f%7Cfde7362665184c0e9415fbcaa5c997f5%7C0%7C1%7C637116495231966462∓sdata=lmMY0yBaj7qoHme0Gea87pkAZFboGoUSNrpqOd%2BFjfE%3D&reserved=0...). The proponent seeks to contribute greenhouse gas emissions to the atmosphere equivalent to those of an entire country at a time when the planet is warming, and the effects of climate change are affecting all life on earth. Port Macquarie Hastings Mayor has publicly acknowledged the grave costs that climate change poses to our community, including its link to the bushfires we face. This quarry undermines any action our community take to adapt to and mitigate climate change for our community health, safety and sustainable economic prosperity into the future. With the poor air quality that we have been experiencing due to bushfire smoke, we cannot afford to clear any more land that supports our environment.

Past EPA Breach

The Proponent - Hanson Construction Materials Pty Ltd were fined \$15,000 in 2016 for breaching the conditions of its Environment Protection Licence at the Sancrox Quarry. It is unacceptable that the NSW Government is even considering a proposal from a company with an existing record of environmental breaches at the site in question.. (Ref:

<https://aus01.safelinks.protection.outlook.com/?url=www.epa.nsw.gov.au%2Fnews%2Fmedia-releases%2F2016%2Fepamedia16032401&data=02%7C01%7C%7C4bf768473b8843c7cdd108d77e13a98f%7Cfde7362665184c0e9415fbcaa5c997f5%7C0%7C1%7C637116495231966462&sdata=VteBeoD1u76j2bIPC2IKCYOJWJ7VwaWk31b6nSnZ%2FJU%3D&reserved=0>).

Loss of Hollow-Bearing Trees

The loss of hollow-bearing trees is another concern – it takes 75-100 years for a eucalypt to form a hollow. The majority of hollow bearing trees recorded in the Biodiversity Assessment Report occur in the Spotted Gum - Grey Ironbark open forest – this association does not occur in the proposed offset area. Furthermore, no hollow-bearing trees were recorded in the proposed offset area and there is no mention of the provision of nest boxes as part of the proposed offset strategy.

Impacts on Water System and Aboriginal Heritage

The proposed development will also affect the local water system. In a time of drought it is unacceptable that the local watercourse that currently supports native flora and fauna will be diverted to industrial use. PMHC councilors have also noted possible risk to local water security if pollution from the project were to enter the water supply that has been carefully planned over decades. Furthermore, there will also be an impact on Aboriginal heritage sites, including a Scar Tree and ceremonial site of “high cultural significance.” (Ref: Annex D, Heritage Report).

Noise

The Port Macquarie region is expanding rapidly. The quarry development is approximately 6km west of Port Macquarie, which is undergoing significant residential development that will be directly affected by the increased environmental impact of the proposed quarry expansion. The Sancrox area has already had a substantial increase in noise (24/7), due to the upgrading of the highway to a motorway. Despite noise mitigation measures, the rural ambience is already reduced and any extra noise generation, especially at night, will only make it worse. The noise impact of a 24 hour, 7 days a week operation is particularly concerning. There will be no respite from constant noisy plant and equipment.

Viable Alternatives to the Quarry

Rather than quarry road base materials, a better option is to utilise plastic bags, recycled glass and printer toner in the construction of new roads. Following China’s ban on foreign waste imports in 2018, Australia now has a glut of recyclables of which only a small fraction is repurposed. Through crushing

glass back into sand, it is possible repurpose not only glass bottles and jars, but also plate glass, drinking ware, crockery and Pyrex into road base. As well as ensuring more glass can be recycled, transforming glass back into sand reduces the need to mine virgin material for road base and asphalt, decreasing road resealing costs and limiting truck movements on the road. Making road base and fill material from recycled products, rather than mining virgin materials, uses considerably less energy and water, and creates less air pollution.

Some examples include:

- * • Downer's \$5million asphalt plant in Teralba, NSW - produces thousands of tonnes each year of sustainable road and pavement materials for the Hunter Region and Central Coast

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- * • Northern Rivers Waste - the first road containing glass sand was constructed in June 2015 at Numulgi and they now use glass sand in much of their road base

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- * • Hume City Council (Victoria) - in 2018 soft plastics from approximately 200,000 plastic bags and packaging, and 63,000 glass bottle equivalents were diverted from landfill to construct a Victorian road in an Australian-first trial

(<https://aus01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.hume.vic.gov.au%2FAboutUs>Contact%2FDetails%2FYourCouncil%2FMediaPublications&Forms%2FMediaReleases%2FMediaReleases2018%2FRoadbuiltwithplasticbagsandglassinAustralian-first&data=02%7C01%7C%7C4bf768473b8843c7cdd108d77e13a98f%7Cfde7362665184c0e9415fbcaa5c997f5%7C0%7C1%7C637116495231966462&data=iAGtwcaWWgBJZGiJRI9K7kQow1LCGFJUGJc78Z46g%2BA%3D&reserved=0>)

- * • Tasmania – in 2018 a Tasmanian council used thousands of recycled glass bottles and plastic bags to build a road south of Hobart

(<https://aus01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fmobile.abc.net.au%2Fnews%2F2018-12-11%2Fnew-plastic-composite-road-surface-trialled-in-tasmania%2F10602294&data=02%7C01%7C%7C4bf768473b8843c7cdd108d77e13a98f%7Cfde7362665184c0e9415fbcaa5c997f5%7C0%7C1%7C637116495231966462&data=aqlyydEb6ISbsHsjWGzZd8NTIUB1p1y85nOqiVbKBbU%3D&reserved=0>)

- * • Sutherland Shire Council NSW - in 2018 a 250-metre long section was the first in NSW to be made out of plastic bags and glass in a trial of a cutting edge technology that could help tackle Australia's waste crisis

(<https://aus01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.smh.com.au%2Fenvironment%2Fsustainability%2Fplastic-and-glass-road-that-could-help-solve-australia-s-waste-crisis-20180802-p4zv10.html&data=02%7C01%7C%7C4bf768473b8843c7cdd108d77e13a98f%7Cfde7362665184c0e9415fbcaa5c997f5%7C0%7C1%7C637116495231976456&data=PnTkjau9I862DXcNN%2FIWDj%2BEHLrfAS3jMFoRo4eTwcA%3D&reserved=0>)