



KOALA KOALITION
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10/10/2023

BORAL STOCKTON DRY SAND EXTRACTION PROJECT
State Significant Development Application SSD-52984213

Dear Sir/Madam,

The Koala Koalition of EcoNetwork Port Stephens (KKEPS) supports the Tomaree Residents and Ratepayers Association (TRRA) submission in full, and in particular we note the following environmental concerns.

KKEPS Koala rescue map shows a several koala rescues in the immediate area surrounding the quarry indicating that koalas are in the immediate area and may be traversing the site, even if not seen during the day by quarry workers or picked up on surveys.

The Biodiversity Offset calculation in the BDAR indicates that ~5 ha of land was excluded from the BAM calculator on the basis that the vegetation integrity class for the section was below the offset threshold for the calculator.¹ However, this section of woodland was previously cleared for the former inland extraction site and the Proponent committed to rehabilitate the land to an acceptable standard as described in the Rehabilitation and Landscape Management Plan for the quarry.²

It would be a distortion of the fairness principles underpinning the biodiversity offset scheme if the condition of land to be cleared is lowered by the prior actions of a landowner (versus the natural condition of the land), which then results in a lower cost of offset. Accordingly, KKEPS supports the TRRA recommendation that the calculation methodology for this project should be reviewed to ensure it fairly reflects the biodiversity impacts from the loss of forest in this area; in particular, in relation to Zone 4, in which 5 ha has been excluded, and Zone 3, which has a lower vegetation integrity score in the calculator than other Zones under rehabilitation.

In addition, we note that for its offset strategy, the EIS proposes to either retire biodiversity credits or make a payment into the Biodiversity Conservation Fund.³ KKEPS again supports the TRRA recommendation that the Proponent also consider the third option raised in the BDAR, which is to consider establishing a biodiversity stewardship site in Proponent's property surrounding the quarry.⁴ This would in some way keep the Biodiversity Offsets in the local area, where there are koalas and other threatened species living nearby, and there is a recognised corridor to the north and south of the site.

¹ EIS, Appendix H, BDAR, sec 6.1.1, Table 16, p 69

² Stockton Transgressive Dune Quarry, Rehabilitation and Landscape Management Plan, Corkery, 2020; sec 4.1, p 5; sec 5.3, p 9; sec 7, Table 3, p 21

³ EIS Main Report, Executive Summary, p xv

⁴ EIS, Appendix H, BDAR, sec 7.2, Table 18, p 72

The Rehabilitation Strategy report mentioned that the 'surrounding natural woodland was identified to consist of primarily ... *E. robusta*,⁵ which is a locally preferred koala food tree. All trees of this species should be retained, wherever possible. If any are cleared, compensatory planting should be carried out.

EIS section 10.2.1 Direct Impacts says that clearing of native vegetation and associated habitat includes 32.75 ha of 'previously rehabilitated areas' (eg, only 2.92 ha of remnant vegetation); but BDAR says Zone 5 (1.7 ha) and 6 (8.21 ha) are remnant or rehabilitated areas that contained scattered remnant trees – the two sections are inconsistent or the EIS statement on direct impacts is downplaying the environmental value of remnant hollow trees on the site.⁵²

The condition of the remnant sections of forest on the proposed quarry site also illustrates the importance of the forested area on the property to the broader ecosystem. For example:

- ~15 hollow-bearing trees per hectare, with numerous small to large hollows taking 100 - 200 years to form;⁶
- Small to large hollows used by roughly 30% of the native fauna species in the BDAR surveys;⁷
- Boundaries on 3 sides of the property shared with Worimi Conservation Lands and a forest buffer to Nelson Bay Road.

Safeguarding the property for conservation stewardship would also preserve other AHIMS sites known to be on the wider quarry property.⁸

According to TRRA research, Port Stephens has already sustained the environmental impacts from approximately 35 current and historical sand mines for construction, foundry, and glass sand, not including additional mines for mineral sands and hard rock quarries.⁹ Establishing a conservation stewardship site on the Tomaree or Tilligerry peninsulas would help to stem further environmental degradation and loss in our region.

The EIS mentions that NSW Wildlife Information, Rescue and Education Service (WIRES) will be contacted to handle and collect for appropriate care in case fauna are injured during clearing.¹⁰ WIRES do not operate in Port Stephens and the following are the two appropriate local contacts that are available 24/7:

- Port Stephens Koala Hospital rescue number – 1800 PS Koalas (1800 775 625) *
- Wildlife in Need of Care (WINC) on 1300 946 295

* Please note that PSKH has diversified to care for most wildlife species and has a vet employed.

Conclusion: by limiting extraction to appropriate levels above the water table, the proposed Dry Sand Extraction Project will avoid some of the more severe or permanent environmental impacts proposed by the Dredge Project. There are, however, aspects of the proposal that should be adjusted to strike the right balance as an environmentally sustainable development. These include maintaining the maximum transport limit of 500,000 tpa; requiring rehabilitation progressively rather than at the end of a 10-year period; and ensuring the biodiversity offset credits are fairly calculated for valuable forest loss in our region.

Yours sincerely,

Carmel Northwood
Convenor

⁵ EIS, Appendix P, Rehabilitation Strategy, p 6

⁶ EIS, Appendix H, BDAR, Annex 7, Hollow-bearing Tree Register, pp 93-98; the Register indicates ~146 hollow-bearing trees which BDAR, sec 4.1.3, p 35 says are located in Zones 5 and 6, the vegetation zones consisting of remnant vegetation or rehabilitated areas that contained scattered remnant trees.

⁷ EIS, Appendix H, BDAR, Annex 5, pp 89 – 90, Fauna Species List; 'Australian Species that Use Hollows'

⁸ EIS Main Report, sec 2.4.1, p 31

⁹ TRRA internal research

¹⁰ EIS Main Report, sec 10.3, p 102