

Department of Planning and Environment  
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Parramatta NSW 2150.

Gerroa Environmental Protection Society  
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Please consider this submission to Major Projects Modification 13 Dunmore Quarry Pit extension DA470-11-2003-Mod-13

Our environment group objects to the proposed destruction of vegetation of state and national significance in this DA Modification and the inability of the compensation proposal to offset this loss.

This quarry will have a significant impact on threatened flora species Illawarra Zieria (*Zieria granulata*) and Illawarra Irene (*Irenepharsus trypherus*) and contribute to cumulative impacts of quarrying in the area on Melaleuca armillaris Tall Shrubland and Illawarra subtropical rainforest Endangered Ecological Communities.

The vegetation composition in the Melaleuca armillaris Tall Shrubland EEC threatened by this DA is not replicated outside the Jamberoo/Albion Park area. This particular EEC is unique in composition in its Illawarra form due to the association with the species *Zieria granulata*<sup>1</sup>.

*Zieria granulata* is listed as Endangered on schedule 1 under the *BC Act 2016* and Endangered under the *EPBC Act 1999*. The *Zieria Granulata Recovery Plan* estimates the total population size of the species to be approximately 8000 mature individuals<sup>2</sup>. It is a local endemic endangered species found in across a limited range of 22 kilometres<sup>3</sup> in the Shellharbour/Kiama area.

The loss of habitat of this species cannot be offset as equivalent habitats are most likely not available and if they were the species is so limited in number and distribution that offsetting locally would lead to unsustainable net losses.

The *Zieria Granulata Recovery Plan* cites clearing associated with quarrying as one of the main threats to its survival, and the ongoing cumulative impacts of hard rock quarrying in the area on this species needs to be taken seriously by planners. The rocky outcrops between Albion Park and Jamberoo is critical habitat and the area encompassing the hard rock quarries between Dunmore and Albion Park contains the largest concentration of this species within its range<sup>4</sup>.

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<sup>1</sup> *Zieria Granulata* Profile <https://www.environment.nsw.gov.au/threatenedspeciesapp/profile.aspx?id=10856>

<sup>2</sup> *Aieria Granulata Recovery Plan*, Department of Environment and Conservation. January 2005

<sup>3</sup> *Zieria Granulata* Profile <https://www.environment.nsw.gov.au/threatenedspeciesapp/profile.aspx?id=10856>

<sup>4</sup> Based on personal observations over the last 20 years

Zieria granulata has been assigned to the Site-Managed management stream under the *Saving our Species (SoS)* program and requires site-based management in order to secure it from extinction in NSW for 100 years<sup>5</sup>

As the proposal to offset the loss of Zieria granulata habitat through the Biodiversity offset scheme cannot physically ameliorate that loss for the reasons given above this development could make a significant contribution to the extinction of the species and may therefore be in contravention of the State and Federal Environment Protection Legislation.

Short sighted compensation proposals are the reason why the NSW Audit office found the Biodiversity offset Scheme was poorly designed and insufficient to offset biodiversity losses in situations like this<sup>6</sup>.

Given the Biodiversity Offset Scheme under the Biodiversity Conservation Act is recognised as not fit for purpose, the particular vulnerability, limited distribution and lack of appropriate offset availability could mean this DA is in contravention of the *BC* and *EPBC Acts*. This would make an interesting case study to test the veracity of the Biodiversity Offset Scheme to protect particularly vulnerable endangered species from extinction.

Howard H Jones  
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<sup>5</sup> Zieria Granulata Profile <https://www.environment.nsw.gov.au/threatenedspeciesapp/profile.aspx?id=10856>

<sup>6</sup> <https://www.audit.nsw.gov.au/our-work/reports/effectiveness-of-the-biodiversity-offsets-scheme>