

Hon Tanya Plibersek MP  
Minister for Environment and Water  
Parliament House  
Canberra

Gerroa Environmental Protection Society  
PO Box 71 Jamberoo NSW 2533  
10 February 2024

Dear Ms. Plibersek

Our Environment group would like to convey our concern about the proposed impact on the habitat of Endangered species *Zieria granulata* in the proposed NSW Major Projects Modification 13 Dunmore Quarry Pit extension DA470-11-2003-Mod-13.

This proposed quarry extension will require the clearing of approximately **900 individual Illawarra Zieria plants (ZG)** listed as an endangered species under the BC Act and EPBC Act.<sup>1</sup>

The *Zieria Granulata* (Illawarra *Zieria*) Recovery Plan estimates the total population of the species to be approximately 8000 mature individuals<sup>2</sup>. It is a local endemic endangered species found 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 not available, and if they were the species is so limited in number and distribution that offsetting locally would lead to unsustainable net losses. Relocation/reestablishment of the species in another location may not be possible as there is no evidence that this particular species can be re-established as it is not easily grown from seed and its habitat requirements are specific and extremely limited.

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 are critical habitat for the species and the area encompassing the hard rock quarries between Dunmore and Albion Park contains the largest concentration of the species within its range<sup>4</sup>.

*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 this species is limited in number and distribution we believe its survival is threatened by this proposal. The removal/relocation of 900 plants equates to around 10% of the estimated population cited in the 2005 Recovery Plan.

There are many other examples of loss of habitat of the species since the ZG recovery plan was developed in 2005. These relate to previous quarry approvals in the vicinity of the Dunmore mine, clearing associated with farming and roadside clearing in the Kiama area. Currently there is a Springside Hill housing development proposal being considered by Kiama Council where an area of ZG habitat could be impacted.

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<sup>1</sup> EMM letter to NSW Department of Planning, Industry & Environment 12 November 2021 (attached)

<sup>2</sup> *Zieria 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

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

We are concerned that the cumulative effects of these impacts are not understood and there appears to be little will by decision makers to take a holistic approach to the conservation of this species.

We request your department work with the Dunmore quarry operators to find alternatives to the destruction of the ZG habitat in their operations or, if relocation is adopted, that it be monitored independently and scientifically and formally reported. We also ask you to consider revising the Zieria Granulata Recovery Plan to reflect these ongoing impacts and threats to the survival of this endangered species.

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Please refer to attached EMM letter to NSW Department of Planning, Industry & Environment 12 November 2021