

Friends of Minnamurra River Incorporated¹

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5 December 2022

Ms Tanya Plibersek MHR
Minister for Environment
PO Box 6022
House of Representatives
Parliament House
CANBERRA ACT 2600

tanya.plibersek.mp@aph.gov.au

cc. Dr Georgia McWhinney, Senior Policy Officer, DCCEW
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Dear Minister Plibersek

SUPPLEMENTARY EVIDENCE AND SUPPORTED COMMENT FURTHER CONFIRMING BORAL LIMITED'S MISLEADING, INACCURATE AND SCIENTIFICALLY BASELESS SUBMISSIONS RE: CAINES' ATSIHP ACT APPLICATION

We refer to your Department's email to us of 29 November 2022 seeking any further information we may have in relation to Mr Gary Caines' applications made on 7 September 2021 under sections 10 and 12 of the *Aboriginal and Torres Strait Islander Heritage Protection Act 1984*, seeking protection of a specified area, Stage 5A and Stage 5B, of the Dunmore Lakes Sand and Soil Project, Dunmore, NSW.

Background and Summary

In relation to Sections 10 and 12 of the ATSIHP Act, FOMR Inc investigations for this submission² have further confirmed that the letter sent to you on 23 September 2022 by Boral Limited's wholly owned subsidiary, Dunmore Soil and Sand, is in all material ways, particularly in relation to their archaeological consultant's use of Ground Penetrating Radar (GPR) at the Specified Area (5B), misleading, inaccurate and scientifically baseless.

¹Friends of Minnamurra River (FOMR) is an active incorporated community-based association formed five years ago to conserve, protect and enhance the estuarine and catchment ecosystems of the Minnamurra River. It has qualified expertise available to it and within its membership in plant and animal ecology, archaeology, hydrology and environmental science.

² This is the fourth response by Friends of Minnamurra River Inc (the third dated 7 November 2022) to invitations by your department to comment further on Gary Caines' ATSIHP Act application.

We also reaffirm all the other information and comments contained in our third submission to you on this matter on 7 November 2022.

Section 12 - Summary

In relation to Mr Caines' application under Section 12 of the ATSIHP Act, seeking the preservation and protection of a specified object or class of objects (including human remains) from injury or desecration, FOMR can inform you that our organisation was the first to publicly disclose the destruction of a wealth of assemblages of Aboriginal artefacts, unprecedented in the local area in question, during Boral Limited's preparation for its new sand mine now established at Stage 5A of the Specified site. (See more detail later.)

In fact, our public call for the protection of Aboriginal objects at the Specified Site came two months before Mr Caines' ATSIHP Act application.

FOMR also called for the protection of that wealth of Aboriginal heritage at Stage 5A but despite this, Boral Limited continued with the complete destruction of Stage 5A and it is now a deep and deepening sand mining dredge pit, just as Boral Limited proposes soon for Stage 5B of the Specified Area.

FOMR also announced and sought public and government protection for the equally if not greater wealth of Aboriginal objects and artefacts which we predicted would occur at Stage 5B of the Specified Area, predictions which were subsequently confirmed by archaeological test pits at Stage 5B.

This huge wealth of Aboriginal heritage occurs throughout the Stage 5B site – the same site in which local Aboriginal custodians, FOMR Inc and other authorities and submitters have informed you and your department that it is nearly certain contain Aboriginal burials, including those of the victims of a massacre by European settlers of Aboriginal people camped at the site in 1818.

We also show and reaffirm below that NSW legislation which purportedly protects Aboriginal heritage in the State is actually designed to aid and abet mining companies and developers to modify and destroy Aboriginal sites and cultural material that may, without the legislation, potentially impede or prevent mining and development projects.

Section 10 and Section 12 - Boral Limited's Scientifically Baseless Ground Penetrating Radar (GPR) Submissions

Boral Limited claims in its submission to you/your Department on 23 September 2022, that Ground Penetrating Radar (GPR) scanning conducted by its archaeological consultant, proves that there are no burials in its Stage 5B site.

There is **only one thing** which the Boral consultant's GPR scanning of the site proves – and that is **not** the absence of Aboriginal burials. What the GPR work **does prove** is that, as also evidenced by the wealth of Aboriginal cultural material previously excavated from salvage archaeology test pits at the Stage 5B site, the area is one of the most important archaeological and Aboriginal cultural heritage sites in southeast Australia.

FOMR now has recent evidence from the Australian Government's National Indigenous Australians Agency (NIAA), within the Department of Prime Minister and Cabinet, which further confirms our submission to you of 7 November 2022 and our information from overseas GPR authorities, also conveyed to you on 7 November, that

it is practically impossible for GPR to detect Aboriginal skeletal material in the form of Aboriginal burials, particularly those of 100 years' antiquity or more.³

The NIAA publication warns that any report of GPR scanning that discusses only the word “anomalies”, as Boral Limited has done in its September submission to you, to try to locate possible human burials on GPR images, should **‘never be trusted’**.

The NIAA publication states (p. 82):⁴

“Never trust results that only discuss ‘anomalies’ that might be seen in GPR amplitude maps or profiles.

“Anomaly is a meaningless term in GPR, as all GPR reflections by definition are anomalies generated by changes in the ground.”

Again, Boral Limited discusses only ‘anomalies’ in its submission to you on its consultant’s GPR scanning of its proposed Stage 5B mining site. **This is yet another demonstration, if any were needed, that Boral’s submission to you claiming that there are no Aboriginal burials in its Dunmore mine site is baseless, completely without foundation,**

Also note the fact that Boral Limited is the *only* entity ever to have claimed that there are no Aboriginal burials in its proposed Stage 5B mining area.

Every other researcher, authority, entity, organisation and Aboriginal custodian and community with a knowledge of the area, has frequently confirmed the near certainty that Aboriginal burials exist in and around Boral’s Stage 5B mine site and not just the burials of the victims of the 1818 massacre by Europeans of an Aboriginal encampment at the site.

As just a couple of examples, the NSW government and the Kiama Municipal Council, acknowledge the high likelihood of human burials at and near the site, the NSW government with roadside signage less than 250m from the proposed mine site stating that the place was favoured by First Nations’ people for the burial of their dead in the adjacent sandy riverbanks and terraces, and the Kiama Council with signage near the proposed mine site acknowledging the 1818 massacre and the nearby burial of its victims.

Again, the NIAA publication⁵, in its chapter on Ground Penetrating Radar (GPR) in helping to identify unmarked Aboriginal graves and cemeteries, makes these statements:

“To date (September 2021) no Aboriginal and Torres Strait Islander mass grave and massacre sites have been identified with GPR in Australia.” (p.77)

“...not all burial plots will contain the expected interment and the great age of some of the burials (that leads to decomposition), means they cannot be easily identified with GPR, if there is no coffin, casket or associated burial goods, an issue that is commonly encountered within all burial contexts.” (p. 69)

³ Sutton, Mary-Jean (Dr); St Pierre, Emma (Dr); Mitchell, Peter (Dr); Conyers, Lawrence (Prof.) and Pearce, Simon, *A Grave Responsibility to Honour Our Ancestors: A National Guide for Aboriginal and Torres Strait Islander Communities to Identify and Protect Unmarked Graves and Cemeteries*, NIAA, Australian Government, Canberra, September 2021.

⁴ *Op. cit.*

⁵ *Op. cit.*

“The main thing to keep in mind is that GPR will rarely be able to identify human remains themselves (particularly those of great antiquity), and more regularly relies on identifying grave cuts, disturbances to the soil profiles, caskets and coffins, and other material remains interred with the deceased.” (p. 80)

The final confirmation that Boral Limited’s claims of no Aboriginal burials in its proposed mine site at Dunmore are scientifically unsubstantiated in their entirety, completely unsupported and therefore almost certainly false, comes from a group of scientists and researchers from the University of Queensland, Flinders University, the Australian National University, Wollongong University, the National Museum of Australia and Wallis Heritage Consulting.

In a paper in *Archaeology in Oceania* in 2014, entitled *Ground-penetrating radar and burial practices in western Arnhem Land, Australia*, the eight scientists wrote: ⁶

“Yet GPR does not offer foolproof detection of all graves, sometimes producing false positives due to other sources of disturbance or, in cases where graves are indistinguishable from the surrounding strata, false negatives or no results (Bevan 1991; Dalan et al, 2010; Davenport 2001; Nobes 1999).

“Unmarked burials, which are common in Australian historical archaeology and almost exclusively the case in Australian Indigenous archaeology, present specific challenges. The particular form of these burials (eg. Bundle, cremation, limited grave goods, shallow depth, no coffin, etc.; see Meehan 1971) and the nature of the geologically ancient sediments into which interment occurs, often impedes their identification with GPR.

“Further, in areas where the sedimentary matrix consists of gravelly, shelly or cobble-rich sediments, there can be significant ‘distortions’ in the data for both the disturbed area of the grave shaft and undisturbed areas adjacent to the grave, adding to the complexity of interpretations (Conyers 2006).

“The limited case studies with which to compare and contrast results in Australia also mean that interpretation is often speculative, with excavation rarely carried out to confirm the specific nature of GPR-identified anomalies.”

More on Section 12

As stated earlier and in previous submissions to you, FOMR has been trying for a number of years to protect the now well identified and established wealth of Aboriginal artefacts, cultural assemblages and manifold other items of Aboriginal heritage from total destruction at Boral Limited’s Stage 5A and 5B mine sites.

Before the Stage 5A site was completely destroyed, along with all its in-situ Aboriginal cultural material earlier this year, for the start of Boral’s sand dredging, the FOMR had publicly campaigned for a cessation to the threats to and destruction of Aboriginal cultural materials. (See FOMR’s two news releases on the matter, issued last year, at **ATTACHMENT 1 and ATTACHMENT 2**)

FOMR also publicly supported the local RAPs (Registered Aboriginal Parties), members of local Aboriginal communities and some Aboriginal custodians of the area, when they went on strike, refusing to continue to conduct Boral’s salvage archaeology at Stage 5A because they were too

⁶ Lowe K.M, Wallis L.A, Pardoe C, Marwick B, Clarkson C, Manne T, Smith M. A, Fullagar R, *Ground-penetrating radar and burial practices in western Arnhem Land, Australia*, **Archaeology in Oceania**, 49 (3), 2014, pp. 1 – 2.

distressed at being continually ordered to destroy their ancestors' cultural heritage at the site using destructive, non-scientific methods. (Again, see the Attachments.)

More recently, the same RAPs have refused to undertake salvage and test archaeology on Boral's Stage 5B site, not only because they were again being asked to destroy their own cultural heritage but because they were severely stressed and distressed about the prospect of disinterring the remains of their ancestors.

Several of the area's Aboriginal custodians have withdrawn their services completely and want nothing further to do with Boral Limited on its proposed sand mine at the site.

However, in submissions to you, Boral claims to have the support of these RAPs. From what FOMR has been informed by the Aboriginal people themselves, it most certainly does not.

Section 13 (2)

FOMR notes that, in accordance with Section 13 (2) of the ATSIHP Act, you "shall not make a declaration in relation to an area, object or objects located in a State or the Northern Territory unless (you have) consulted with the appropriate Minister of that State or Territory as to whether there is, under a law of that State or Territory, effective protection of the area, object or objects from the threat of injury or desecration."

FOMR wants to point out to you the irony of this ATSIHP Act clause in relation to the relevant laws of NSW.

The irony (and perversity) is that it is precisely the laws of NSW, together with the way the current NSW government has applied them in the case of Boral Limited's sand mining proposals at Stages 5A and 5B of the Specified Area, which have led you to considering declarations of the Specified Area under Sections 10 and 12 of the ATSIHP Act.

Not only is the NSW government allowing Boral Limited to override all the State's legislative protection for the biodiversity and the flora and fauna of the Specified Area, particularly Stage 5B, but NSW National Parks and Wildlife legislation actually aids and abets the destruction of Aboriginal heritage and objects if they are an impediment to mining and development projects.

We have several times publicly raised the issue of the destructive intent of NSW legislation in relation to Aboriginal heritage potentially impeding mining and development projects.

In a FOMR news release last year (at **ATTACHMENT 1**), we raised the matter again and explained just how actually and potentially destructive the NSW legislation is to the wealth of Aboriginal heritage and objects contained in the Specified Area, particularly Stage 5B, of Boral's new sand mining projects at Dunmore.

We ask you to consider that when applying Section 13 (2) in the case of the Specified area at Dunmore.

And Finally...

It is highly significant that the ATSIHP Act defines a *significant Aboriginal object* as including Aboriginal remains.

This is because very much of the angst and human distress being caused among Aboriginal and non-Aboriginal people by the sand mining proposal at Dunmore, NSW, arises from the near certainty that Aboriginal burials, including those of the victims of the 1818 massacre at the site, will be not only be desecrated but obliterated if Boral Limited is permitted to proceed at Stage 5B.

Such loss would be a dreadful addition to the destruction of a unique Aboriginal landscape of biodiversity and ancient and historical cultural heritage so important, so vital to the wellbeing, of the local living relatives of the people who occupied the site for many millennia.

The NIAA publication⁷ describes such potential loss in these terms:

*“This guide was developed for, and with, Aboriginal and Torres Strait Islander communities to address the national issue of lost and desecrated graves and resting places of their ancestors and families, **the deep hurt that comes from these losses, and the solemn responsibilities communities have to find and protect these final resting places.**”⁸*

We trust that a declaration soon under Sections 10 and 12 of the ATHP Act at the Specified Area at Dunmore, NSW, will permanently stop this hurt, at least in our large region south from Sydney.

Please contact us for any further information or with any questions.

Yours sincerely,

Will Chyra
Chair
FOMR Inc

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0419 633 191

⁷ NIAA publication, *Op. cit.*

⁸ *Op. cit.* p. 7.

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ATTACHMENT 1

For Immediate Publication

NEWS RELEASE
with Photo

15 July 2021

NSW GOVERNMENT REGULATIONS PERMIT INDUSTRY'S DESTRUCTION OF ABORIGINAL CULTURAL HERITAGE AT MINNAMURRA RIVER

NSW government regulations are permitting the destruction of ancient and unique State-significant archaeological and Aboriginal cultural heritage sites in the Minnamurra River catchment at Dunmore.

The river protection community organisation, Friends of Minnamurra River Inc (FOMR), warned today that archaeological consultants working for Boral Limited on two new approved sand mining sites near the Minnamurra River estuary, are literally washing away archaeological and Aboriginal cultural heritage sites many thousands of years and possibly tens of thousands of years old.

Current NSW government regulations on archaeological and cultural heritage assessment⁹ allow the “salvage” of potential archaeological sites, such as those in the Minnamurra River catchment, using techniques that destroy those sites and prevent their scientific investigation for the recovery of their full records of Aboriginal cultural heritage.

The government regulations specifically exempt corporations and individuals from prosecution for damaging or destroying Aboriginal artefacts and potential archaeological sites in mining and development project areas.

FOMR says soil from the salvage archaeology sites being dug at Boral's Minnamurra River future sand mining pits is flushed through screens using water.¹⁰

Flushing with water leaves only a jumble of undated stone artefacts of very little scientific or educational use and destroys practically all other material which could otherwise be used to scientifically determine the age of the site, the richness and change of Aboriginal lifestyle and culture through time, as well as climate and other local and regional environmental changes over many thousands of years.

FOMR Chair, Will Chyra, says Aboriginal stone artefacts, the predominant archaeological objects recovered when archaeological dig soil is washed by water, tell virtually nothing about local Aboriginal cultural heritage because they are not dated and therefore cannot be placed in any prehistoric cultural or environmental timeline or change sequence.

Reliable sources report that large numbers of stone artefacts of various types are being flushed out even at the site of low significance currently being ‘salvaged’ in front of Dunmore House.

⁹ *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*, Department of Environment, Climate Change and Water NSW, September 2010, and *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales*, Department of Environment, Climate Change and Water, September 2010.

¹⁰ In scientifically conducted, non-salvage, stratified archaeological ‘digs’, material carefully excavated layer by layer, each layer about 40mm to 50mm thick, is shaken through 2.0mm to 2.5mm mesh screens or sieves to separate out not only solid artefacts but also organic material such as remains of plants and animals, and carbon from ancient campfires, essential for dating the site/s being excavated.

“This tragic wastage of our human cultural heritage and knowledge of prehistory is worsened by the fact that the government regulations require the stone artefacts recovered, probably many thousands to hundreds of years old, to be bundled together and sent to the Australian Museum in Sydney just for storage”, Mr Chyra says.

FOMR says stratified and accurately dated archaeological sites in the Illawarra region and along the NSW coast are relatively rare and the sites near the Minnamurra River estuary currently being or about to be ‘salvaged’ - and destroyed - are likely to be potentially unique in telling the prehistory of the Illawarra and possibly other areas of the NSW coast.

“Their destruction, permitted by government regulations, is robbing humankind of parts of its history,” Will Chyra says.

Boral’s archaeological consultants, Kelleher Nightingale, has classified two of the larger sites to be ‘salvaged’ near the Minnamurra River as “sites of high to moderate archaeological significance” with their “intactness the most important variable for determining archaeological significance in this instance”¹¹. The NSW Department of Planning, Industry and Environment has been informed of this.

However, once ‘salvaged’, the sites’ scientific archaeological and Aboriginal cultural heritage values will be completely lost and any sites not destroyed by the salvage archaeology are scheduled to be destroyed anyway when Boral starts mining sand on its site 5B.

Will Chyra says FOMR last week appealed in writing to Boral Limited to stop the current destructive salvage archaeology operations and asked Boral instead to request its consultants to conduct full and proper scientific archaeological investigations or ‘digs’ at the two sites near the Minnamurra River estuary classified as highly to moderately significant.

Boral has yet to reply.

The Illawarra Local Aboriginal Land Council says it is very unhappy about what’s occurring at Boral’s Minnamurra River sites but is powerless to do anything about it because of the NSW government regulations permitting the destruction.

The Land Council says the regulations exist only to allow industrial projects to proceed.

It told the NSW Independent Planning Commission in November last year of “what we believe is a failure in the approach that (Boral’s consultants) Kelleher Nightingale have applied and the predetermined position in our view of consultants that are engaged to undertake what should be the protection of Aboriginal heritage but inevitably becomes a process to get the proponent through the planning process.”¹²

¹¹ Letter from Kelleher Nightingale Pty Ltd to Boral Land and Property Group, 29 October 2019, at: <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=DA195-8-2004-MOD-2%2120201126T033641.582%20GMT>

¹² *Submission to NSW Independent Planning Commission on Dunmore Lakes Project Modification 2*, Paul Knight, CEO, Illawarra Local Aboriginal Land Council, 2 November 2020, p. 4. <https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/project-submissions/2020/09/dunmore-lakes-project-modification-2/20201104t122911/dunmore-lakes-project-odification-2--ipcsigned.pdf>.



Photo (FOMR): Salvage archaeology under way in July at Boral Limited's approved sand mining site 5A near the Minnamurra River estuary at Dunmore, NSW. In the background, archaeological dig workers use water to flush soil excavated from the dig pit in the middle foreground through mesh screens, destroying practically all archaeological evidence but stone artefacts impossible to accurately date or put into scientific archaeological context.

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ATTACHMENT 2

For Immediate Publication

NEWS RELEASE

28 September 2021

SAND MINE NEAR KIAMA WILL BE THE AUSTRALIAN EAST COAST'S JUUKAN GORGE

The Federal and NSW governments and mining company, Boral Limited, will oversee the east coast's Juukan¹³ Gorge if sand mining is permitted to destroy what archaeologists have recently discovered is perhaps the richest Aboriginal cultural heritage site in coastal Australia, close to the Minnamurra River near Kiama, NSW.

The river-protection community organisation, Friends of Minnamurra River Inc (FOMR), issued the warning today as it announced its support for the Illawarra region's Indigenous groups and the Illawarra Local Aboriginal Land Council (ILALC) which has formally applied to the Federal government, under Section 9 of the *Aboriginal and Torres Strait Islander Heritage Protection Act*, requesting a stop work at the proposed sand mining site.

The stop work would enable a review of the impact to cultural heritage objects and potential skeletal remains at the site, beside the river at Dunmore, NSW.

Archaeologically-experienced Registered Aboriginal Stakeholders, employed by Boral's archaeological consultants, have for three months been conducting an archaeological salvage program, excavating numerous one-metre square test pits at the proposed mine site. They have become increasingly concerned about their finding of a surprising and unexpected wealth of cultural material created by their ancestors living in the area for probably over tens of thousands of years.

They are frustrated by the current NSW government regulations on archaeological and cultural heritage assessment¹⁴ which allow the "salvage" of potential archaeological sites, such as the potential mine site in the Minnamurra River catchment, using techniques that destroy those sites and prevent their scientific investigation for the recovery of their full records of Aboriginal cultural heritage.

¹³ The mining company, Rio Tinto, in December 2020 attracted international shame by allowing its employees to destroy 46,000 year old Aboriginal archaeological and cultural sites at Juukan Gorge in Western Australia. Rio Tinto executives resigned and the company has published this apology: *In allowing the destruction of Juukan Gorge to occur, we fell far short of our values as a company and breached the trust placed in us by the Traditional Owners of the lands on which we operate. It is our collective responsibility to ensure that the destruction of a site of such exceptional cultural significance never happens again, to earn back the trust that has been lost and to re-establish our leadership in communities and social performance.*

¹⁴ *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*, Department of Environment, Climate Change and Water NSW, September 2010, and *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales*, Department of Environment, Climate Change and Water, September 2010.

The NSW government regulations specifically exempt corporations and individuals from prosecution for damaging or destroying Aboriginal artefacts and potential archaeological sites in proposed mining and development project areas.

The experienced First Nations' archaeological teams, known as Registered Aboriginal Stakeholders under NSW government legislation, at Boral's proposed new mine site at Dunmore are also constantly fearful that they will unearth burials, known to be in the vicinity of the site, of the six Aboriginal people murdered by a group of white settlers in 1818. There are still descendants of some of those victims living in the local area.

The Illawarra Local Aboriginal Land Council has stated on ABC news that it believes the registered Aboriginal personnel on the site are working under duress and that the site is too significant to be continuing the work.

Like FOMR, it wants Boral to abandon its plans for the sand mining at the site - mining which Boral says would have an operating life of only three years anyway - and the landscape left in its natural state.

"The richness and cultural heritage of the proposed mining site and its importance to us all as a site of human adaptation, experience and gathering for tens of thousands of years is simply too great to have it destroyed for very short term industrial and commercial expedience," says Will Chyra, Chair of FOMR.

"The destruction of this site at Dumore by mining would be the Australian east coast equivalent of the dreadful and irrevocable loss that all Australians witnessed with a mining company's destruction of Juukan Gorge in Western Australia less than a year ago," Mr Chyra says.

The proposed mining site, currently an endangered ecological community protected by NSW law - which the NSW government would allow Boral to override to dig its mine and completely destroy the site - covers an ancient landscape where the saltwater of the sea met the freshwater thousands of years ago.

FOMR says that this indicates it was a significant meeting place and ceremonial land for freshwater and saltwater Aboriginal tribes.

"The multitude of stone tools and other ancient artefacts being unearthed show a long continuous occupation of Aboriginal cultural heritage, similar to Juukan Gorge, so the site they're coming from must be preserved. Boral's proposed sand mine must be stopped," Mr Chyra says.

The ILALC's application to the federal Environment Minister to order a stop work at Boral's proposed new Dunmore mine site is the second Federal government intervention sought to stop the mine proceeding.

A number of local residents and the Federal Member for Gilmore, late last year complained to the Federal Environment Minister that, among other things, Boral and the NSW Department of Planning, Industry and Environment (DPIE) breached the Australian *Environmental Protection and Biodiversity Conservation Act* (EPBC Act) by failing to disclose that the proposed sand mine would or could impact SE Littoral Rainforest at and near the site. The SE Littoral Rainforest is listed under the EPBC Act as "critically endangered".

The threat to the SE Littoral Rainforest is in addition to what the NSW DPIE concedes are other major effects if Boral's proposed new mine proceeds:

- Destruction of 4.5ha of rare, ancient and high quality bird and animal habitat, Bangalay Sand Forest, a State-protected Endangered Ecological Community comprising 100 to 400-year old trees;
- Risks to another Endangered Ecological Community, Coastal Saltmarsh, protected in NSW and listed as vulnerable under the EPBC Act and for which the NSW government has developed a "Save Our Species" recovery program to try to reverse the continuing loss of this high value EEC;
- The cutting and clearing of an additional 3.0 ha of high value native vegetation, unique to the Minnamurra River catchment area.
- Six fauna species listed as threatened under the NSW *Biodiversity Conservation Act* have been recorded in the mining site to be cut and cleared.

Media Contact: Will Chyra, Chair, FOMR Inc, 0419 633 191