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Submission to proposed approval for the Bell Bay Pulp Mill.

On behalf Timber Communities Australia's (TCA) Tasmanian membership I am pleased to be able to convey support and acceptance for the proposed approval of the Bell Bay pulp mill.

The proposed approval document's carefully and in detail considers likely impacts on the three controlled actions, threatened and migratory species and Commonwealth marine areas. The proposed approval includes design measures as well as mitigation strategies associated with the construction and operation of the pulp mill and its associated wharf, effluent treatment, waste disposal and its water and treated effluent pipelines. It examines the relationship of the pulp mill and its operation with the three controlled actions. TCA believes the documentation demonstrates that there will not be a significant impact on any species of flora or fauna or on the Commonwealth marine environment,

In making comment to the proposed approval TCA has considered the Department of Environment and Waters EPBC Act Policy Statement 1.1 Significant Impact Guidelines.

TCA has also noted Clause 2b of section 75 of the Act that states:

Without otherwise limiting any adverse impacts that the Minister must consider under paragraph (2)(a), the Minister must not consider any adverse impacts of:

- (a) any RFA forestry operation to which, under Division 4 of Part 4, Part 3 does not apply; or*
- (b) any forestry operations in an RFA region that may, under Division 4 of Part 4, be undertaken without approval under Part 9.*

This is consistent with the Prime Minister's statements in relation to the pulp mill and the RFA made in 2004 and 2005, and the outcomes of the 2005 Tasmanian Community Forest Agreement that amended the RFA and the recent amendment to the RFA, particularly clause 68 that states:

The Parties agree that the CAR Reserve System, established in accordance with this Agreement, and the application of management strategies and management prescriptions developed

under Tasmania's Forest Management Systems, protect rare and threatened fauna and flora species and Forest Communities.

It is TCA's view that the RFA was put in place to deliver a secure future for both the environment and families across Tasmania that is reliant on our forests and forests products. The social impacts of these agreements are very significant and the health of our forests and rural communities is vital to Tasmania's future sustainability.

It is worth noting that the developer has in preparing the Impact Assessment attached or referred to the very extensive IIS process undertaken to meet the requirements of the Tasmanian Governments Project of State Significance process. The IIS included an environmental impact statement that addresses key environmental values of national significance.

That 100 page Impact Assessment detailed threatened species, migratory species including marine animals and birds as well as looks at the pulp mill's emissions both to the marine environment and the atmosphere. The Impact Assessment compared actual designed emissions with the *2004 Guidelines for Emissions* developed by the Tasmanian Government.

The Impact Assessment also included information from surveys and scientific studies and from modelling and peer reviewed reporting. Also worth noting is the Assessment also referred to the supplementary information produced to answer criticism, concerns and queries from experts engaged by the RPDC and from the general public including a range of submissions from the 'environmental movement'.

Using the criteria listed in EPBC Act Policy Statement 1.1 Significant Impact Guidelines, TCA prepared its own check sheet based upon our reading of the relevant sections of the Impact Assessment and Supplementary IIS information

National Environmental Criteria	Likely to be Significant Impact	NOT Likely to be Significant Impact
Threatened Species and Communities		
critically endangered or endangered species		x
Vulnerable species		x
Critically endangered and endangered ecological communities		x
Listed Migratory Species		x
The Commonwealth marine environment		x

TCA considered that the conclusions of the Impact Assessment are valid in relation to the 3 controlling provisions, marine environment (Sections 23 & 24A), listed threatened species and communities (Sections 18 and 18A) and listed migratory species (Sections 20 and 20A).

TCA also believes that the Impact Statement has been developed by a process that was open to public scrutiny and review. Also worth noting is Importantly after public comment and peer review under the old RPDC

process many of the issues related to the National Environmental values was clarified.

For example Dr Roger Drew of Toxikos concluded:

Bell Bay pulp mill effluent of the quality specified by the mill designers, and discharged into the marine environment approximately 3 km offshore near Five Mile Bluff in the manner specified, will not adversely impact the survival, breeding and migration of fish, marine mammals, birds, or other organisms in Tasmanian or Commonwealth waters. It is considered the existing primary productivity of the surrounding ecosystem will be unaltered, which together with lack of direct toxicity to organisms, indicates ecological community structures and species diversity are unlikely to be adversely changed by the discharged effluent.

Section 23 of the EPBC act divides the impact on Marine areas into two classifications, one taken within the area, and others made outside the area that either has or likely to have an impact. Worth noting is in this case the pulp mill and all associated infrastructure is outside the marine area and the most probable source of impact is the treated effluent from the outfall pipeline located about 3 kilometres to the south of the Commonwealth Marine Area. Evidence in the Impact Assessment shows this treated effluent will be diluted over 9000 times between the outfall and the Commonwealth Marine Area. Evidence also includes hydrological modelling to determine the fate of that treated and diluted effluent.

Another important point from Impact Assessment was, there has been consideration for the impacts of the construction and operation of the pulp mill. The Assessment also details a desktop review and field surveys to establish a sound understanding of the existing environment and place it within a regional and national context. It also considers communities and listed ecological communities and threatened flora. There is also a thorough examination of listed threatened fauna species including amphibians, terrestrial mammals and birds, as well as invertebrates, freshwater fish, marine species and marine birds. All very important matters

TCA was also pleased that the Impact Assessment showed how the mills designers have ensured there will not be significant impact, also how the mill's engineers have created innovative solutions to protect the environment. The Impact Assessment demonstrated that the mill will be clean, green and clever.

Also worth noting from the Impact Assessment is the mills impact in relation to greenhouse gas emissions and its positive global warming footprint. A big bonus in this regard is the mill will generate its own power from renewable harvesting residues and process waste. It will be able to on sell to the national grid almost 100 Megawatts of power. This could lead to reduction of CO2 in our oceans including Bass Strait.

This possible CO2 reduction is important as TCA is aware that there is some concern expressed in the scientific community that increased CO2 could lead to the acidification of the ocean leading to impact on listed migratory marine species such as whales that feed on affected food (krill). This potential for a

CO2 positive reduction should not be ignored, and it is recommended that it be incorporated into the Impact Assessment.

The IPCC WGII Fourth Assessment Report states

The uptake of anthropogenic carbon since 1750 has led to the ocean becoming more acidic with an average decrease in pH of 0.1 units [IPCC Working Group I Fourth Assessment]. However, the effects of observed ocean acidification on the marine biosphere are as yet undocumented].

Another important point from the Impact Assessment was its greenhouse gas evaluation that concluded that the operations of the pulp mill will reduce Gunns' net greenhouse gas emissions by approximately 1.3 million tonnes CO₂-e per annum. This compares with Tasmania's 2005 GHG emission level of 10.98 million tonnes CO₂-e as recorded by the Australian Greenhouse Office. This means that the pulp mill will reduce Tasmania's emissions by 10%.

The Impact Assessment is comprehensive on the 3 Commonwealth controlled actions and considers the possible impacts in detail. Very important to TCA is the Assessment provides a range of other relevant background information, including environmental history of the developer and its proposed management strategies. A general overview of the proposal is given in common ever day language to enable the reader to have confidence in the proposal and its likely impacts.

Equally pleasing to TCA was this Assessment also included descriptions of the investigations and assessments that relate to the assessment of the possible impacts of the project on the matters of national environment significance. It was good to see that there are separate sections on each of the 3 controlled actions as well as extensive listings of items considered.

Whilst the Assessment dealt with possible adverse impacts and their significance, there was not a lot of discussion on likely positive impacts apart from reduction in greenhouse gas and predicted benefit. Other benefits TCA believed was important, include the fact that the mill if approved will add 2.5% onto Gross Domestic/ State Product, \$6.7 billion to 2030. This increase will see more taxation collected more jobs, more investment and more financial activity. This will flow onto both Commonwealth and State taxation receipts, company tax, GST, payroll tax, income tax and stamp duty. This extra income could be used to fund programs of research into threatened and migratory species.

The extra GD/SP will also create extra demand for the sustainable harvest of fish from commonwealth marine area. Again a positive, by focusing more resources on the management of these Commonwealth environmental issues.

In conclusion, TCA believes that Impact Assessment clearly demonstrates that there is little likelihood of the pulp mill having significant impact of any of the 3 National Environmental Values listed by the Minister as controlled actions under the EPBC Act.

Therefore TCA requests that the Federal Minister acts quickly as possible to amend this proposed approval to a final formal approval.

Barry Chipman
Tasmanian State Manager