

MY SUBMISSION TO THE  
RESOURCE PLANNING  
AND DEVELOPMENT  
COMMISSION RE GUNNS'  
INTEGRATED IMPACT  
STATEMENT

by

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September 14th 2006

## MY QUESTIONS AND CONCERNS REGARDING GUNNS PROPOSED ECF PULP MILL

### AIR POLLUTION

#### **Re Vol 10 Appendix 21 Page 19 Lines 6-8**

How can a true evaluation of the air emissions be deduced at all when as the IIS clearly states *'there is the absence of detailed characterisation of the emissions'*?

#### **Re Vol 10 Appendix 21 Page 25 final paragraph**

Launceston situated as it is at the end of a valley surrounded by hills is in the worst possible situation for the trapping of air pollutants overnight especially in autumn and winter months due to temperature inversion. Any extra pollutants such as those from the proposed mill can only exacerbate the situation. The prevailing winds are virtually always from the N.W so the plume from the stacks will head straight up the valley to Launceston.

#### **Re Vol 10 Appendix 21 Page 34 3<sup>rd</sup> paragraph**

Which are the components of pulp mill emissions unique to Bell Bay Air Shed? Are they toxic? What will their emission levels be?

#### **Re Vol 10 Appendix 21 Page 34 4<sup>th</sup> Paragraph**

How do you know that the actual release concentrations will not be way above those estimated? The IIS clearly states *'Because the mill has not yet been built actual release concentrations of emissions are unknown'*?

#### **Re Vol 10 Appendix 21 Page 35**

Just recently i.e. late August early September 2006 it was announced that Launceston's air quality has markedly improved due to measures to reduce the amount of wood heaters being installed plus the improvement in quality of existing ones. Any emissions from the mill will set this programme back.

#### **Re Vol 10 Appendix 21 Page 37 4.1.1**

How can you conclude any assumptions on the effect of emissions from the proposed Pulp mill, when the existing emission figures from the 5 established industries in the area have not been disclosed openly, and were given under strict confidentiality to Gunns? The whole emission review process is therefore flawed and consequently invalid.

#### **Re Vol 10 Appendix 21 Page 37 4.1.1**

Only SO<sup>2</sup> NO<sup>2</sup> and PM<sub>10</sub> were studied, *'other substances emitted by these industries was not made available'* Why were these other substances not studied? According to

Page 40 of the Final Scope Guidelines for the IIS, Gunns was to publish the estimated load of PM<sub>2.5</sub> emissions from the power boiler, lime kiln and concentrated non-condensable gas incinerator. They have not done so. These Pm<sub>2.5</sub> particles are much more dangerous to health as due to their small size they are so easily absorbed into the lungs. cause respiratory disease and carry adsorbed toxins into the body.

**Re Vol 10 Appendix 21 Page 37 bottom paragraph**

I do not think average emissions should be used as a template for assessment. Only one day with excessively high emissions could cause far more health problems just by itself than weeks of a much lower amount. Much more important would be to review the number of days when they were extreme, and as this cannot be 100% assessed until the mill is actually built and the emissions checked the whole thing is pure conjecture and not based on scientific fact.

**Re Vol 10 Appendix 21 Page 39 bottom paragraph**

*'Most of the time the concentration will not be zero, but nonetheless will be very low'* How low? Which pollutants? For example there are no safe levels of Dioxins. Much more detailed analysis required.

**Re Vol 10 Appendix 21 Page 179**

Why has the NEPA emission allowance of 50micrograms/m<sup>3</sup> for Pm<sub>10</sub> particles not been adhered to? Instead the much higher DPIWE (2004) of 150 micrograms/m<sup>3</sup> has been used.

**Re Vol 10 Appendix 21 Page 239 bottom paragraph**

*'Because background air concentrations of metals in the Bell Bay Region are not known at this time'* Why are they not known? Surely this should have been studied? This invalidates the whole section on air concentration of metals.

**Re Vol 10 Appendix 21 Page 241 top of page**

*'A thorough evaluation of the contribution of inhalation exposure to total intake of metals has not been undertaken'* Once again, no research. Studies should have been carried out.

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**TRANSPORT**

**Re Vol 15 Appendix 43 Page 29**

According to the chart on this page, Launceston Municipality already has the highest log truck and B-Double crashes in the state. During the construction phase of the mill and thereafter (due to the increased amount of wood chips coming to feed both the pulp mill and the existing wood chip mill) the incidences of these accidents must surely increase?

**Re Vol 15 Appendix 43 Page 40**

Requirements of RPDC Final Scope Guidelines 4.4.1. section (2) have not been adequately addressed here. For a start the chart used to ascertain pre pulp mill levels of daily truck traffic is grossly out of date, referring as it does to a 1997-98 assessment. A much more recent study is required to reflect the accurate levels. Even so, it is obvious that in the Tamar Valley area, levels are some of the highest in the State.

**Re Vol 15 Appendix 43 Page 63**

I am concerned that caustic soda is to be transported by road to Bell Bay from Hobart. What are the possible hazards to health if a truck carrying this load is involved in an accident and spillage occurs? What contingency methods have been put in place at the mill site in case of chemical leakage, explosions and other unexpected factors?

**Re Vol 15 Appendix 43 Page 70**

During the start-up process at the mill there will be a vast increase in the average daily amount of trucks in the whole state, 651; the majority of these, 351 occurring in the N.E. area. As, apart from the East Tamar Highway, the roads here are not major highways and can be narrow and winding, what safety measures are to be put in place to protect other road users from this massive increase in trucks, log trucks in particular? Who will be responsible for paying for the damage that will be caused to roads already languishing from funding for repairs? It should not have to be the ratepayers of George Town and Launceston municipalities.

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**WATER SUPPLY**

**General Comments**

I pay water supply charge of \$232.00 annually, plus 64c per kilolitre, to West Tamar Council. Gunns should also be required to pay for the gigantic amount of water, 26 billion litres, that it proposes to draw from Lake Trevallyn annually. **It should not have free access.**

This year has been the driest in Tasmania in most areas for the past 100 years. What happens in severe drought conditions, will water restrictions apply to home and business owners in the Launceston area? Gunns' water supply **should not** take precedent over us, **our needs should come first.**

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## WATER POLLUTION

### **Vol 3a Section 10.9 Page 40**

*'Northern Tasmanian coastal waters are known to support a significant range of species of significance that are protected under State of Commonwealth legislation'*  
In view of this there should be no effluent outfall at all in this area.

### **Re Vol 3a Section 10.9 Page 40**

*'A detailed assessment of the state of the marine environment is limited by the almost complete absence of baseline studies (past and present) by which changes from the existing state can be measured'.*

There has not been enough scientific study into this area to clearly state what affect the pulp mill effluent would have. Only a few brief measurements were taken by Aqueal, those in April, June and September 2005. Much more on site research is needed.

### **Re Vol 3a Section 10.9 Pages 44 and 45**

Several occurrences of heavy metals are already found in the area. This will be exacerbated if the pulp mill's effluent constantly disgorges at this site.

*'There are currently no guide lines available for trihalomethanes, dioxins and furans, although concentrations of these analytes were below detection level in **most** samples analysed.'*

That means that there were still some detected and as I understand it, there are no safe levels of dioxins.

### **General Comment**

Tidal flows in Bass Strait are very sluggish. They are estimated to take 160 days to flush through the area. This means that the build up of effluent in the area will be huge and will have devastating effects on marine flora and fauna.

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## SOCIAL IMPACT

With Gunns' increased need for wood to supply not only its extant wood chip mills but also the proposed pulp mill, it will need to increase the amount of wood plantations.

Here in Tasmania rainfall is considerably less than it used to be and that combined with the increase in forestry plantations using 50% more water than the equivalent native forests during their peak growing period, surely will have disastrous effects on Tasmania's water supplies. It does not make sense to encourage these forestry

companies to set up new plantations, many of which have already converted valuable farmland into monoculture plantations as we are losing the capacity to manage our water resources in a sustainable way. By keeping our farmers on the land, we will also keep our country towns and communities alive, unlike Preolenna, here in NW Tasmania which died once the forestry plantations were established on what was once prime farmland and the farmers and their families moved away.

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## ECONOMICS

Over the past 30 years the global pulp price has been steadily declining. In 2004 it was worth only two thirds of its 1974 price. (Source FEOSTAT) Surely it would be madness for Gunns to even consider building such a huge mill when its product is steadily decreasing in value worldwide?

If, in a worst case scenario, it foundered financially, it could easily then be a target worldwide for any foreign company to snap it up. What safeguards are there in place for stringent environmental pollution control guidelines into the future? Would a foreign owner be subject to the same stringent regulations as Gunns? Would foreign workers then take over Tasmanian jobs?

As more Native forests are logged what will happen to our unique and world famous Leatherwood Honey Industry?

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## CONCLUSION

Gunns should seriously reconsider the whole concept of a vast ECF pulp mill. **There are too many uncertainties.** There has been neither enough background environmental research nor satisfactory modelling, which must at best be purely theoretical. Why did they not continue with their initial plan for a closed-loop TCF mill? This would have considerably reduced much of the pollutants and negated the need to withdraw massive volumes of water from the Trevallyn Dam.

If the mill goes ahead there will be serious threats from water and air pollution; our magnificent native forests will be decimated; farmland will have to be converted to plantations to keep up wood supplies, resulting in the death of small rural communities.

Massive increases in the number of log trucks and those carrying dangerous chemicals must inevitably be accidents waiting to happen.

Our increasingly precious water from Trevallyn Dam will be guzzled at 26 billion litres per year, and spewed out, polluted, into Bass Strait. Farms situated next to forestry plantations are increasingly noticing the ground water supply diminishing, as these young plantations consume vast amounts of water.

Increasing plantations and their attendant use of herbicides, pesticides etc will severely impact on native fauna and flora. Run-off residues from degraded riparian areas will poison our rivers and streams.

Surely it would make more sense in every way for Gunns to abandon the pulp mill plan entirely and instead build much smaller concerns, with far more valued added schemes such as veneer mills, laminated veneer lumber mills, sawmills and engineered strand lumber plants. They could build 2 of each of these for less than the price of the pulp mill, create about 4 times the amount of direct jobs, stop the need for clear-felling by selectively logging, stop the need for conversion of prime farmland to forestry plantations thus helping to conserve our precious water supply and keep rural communities the vibrant places they are now.

Signed:- 