

Dr. John R. Wilson OAM

5th September 2006

Resource Planning & Development Commission
GPO Box 1691
Hobart Tas 7001

**Re: GUNNS LTD.
DRAFT INTEGRATED IMPACT STATEMENT**

Thank you for the opportunity to comment on the Draft Integrated Impact Statement (IIS) for Gunns Ltd's proposed Kraft Pulp Mill at Longreach, Tasmania.

I imagine that most of my comments will be deemed outside the scope of the Resource Planning and Development Commission's brief: however, I do feel they need to be said. More so because the iniquitous rubber stamp of approval has appeared to be hanging over this project from day one, as evidenced by both the major parties, and State and Federal Governments eagerly talking up its prospects and competing in public subsidies.

Share-prices:

Firstly, it ought to be noted that Gunns Ltd's share prices have dropped considerably in recent years, and are continuing to fall on the Australian Stock Exchange.

Most of the national media attribute this fall in value to falling international prices for woodchips and pulp as plantations from elsewhere come on line, together with negative publicity resulting from some of Gunns Ltd's own activities, including its destruction of native forests and rainforests in Tasmania, and its unwarranted harrassment, intimidation and persecution of the 'Gunns 20' community group in the Melbourne Supreme Court.

This court action is clearly designed to intimidate everyone, not just the defendents in this case.

The drop in the Gunns Ltd's share price has considerable relevance to this proposed industrial development, particularly in wider social and political questions concerning what to do about the short-fall in development costs which may have to be made up through additional direct and indirect government subsidies, as well as those other perhaps more difficult questions about what might occur, if the company goes 'bust', or (as seems increasingly likely) is subjected to an unfriendly 'take over' by an international competitor.

With Gunns Ltd's share prices continuing to fall over a sustained period, its fortunes must already be appearing to be less than robust to potential corporate raiders. Perhaps they are already circling, sensing their prey.

If that is what eventuates, what will the demise of the Tasmanian company and its brand mean to the Tasmanian Labor State Government, which has, for all intents and purposes, been keenly acting as the chief supporter, promoter and advocate of this particular project? Does the State Government expect the Tasmanian people to give a corporate raider the same kind of parochial loyalty that Gunns Ltd. has enjoyed thus far? And will the State Government be in any position to negotiate improved outcomes for the Tasmanian community with a large, and hitherto unknown, internationally-based corporate player that, at the end of the day, feels no sense of loyalty in return to Tasmania or to Tasmanians?

Obfuscation:

Secondly, the extensive bulk of the Integrated Impact Statement itself ought to be noted, for I suggest that it has become an exercise in obfuscation the like of which we in Tasmania have never seen before, other than in the 'Yes Minister' television series which got a run some years ago on the BBC.

As an seasoned examiner of students' attempts at technical and rhetorical obfuscation for many years, I would rate this Draft IIS a 6 (or less) out of 10.

Of course one hopes that the advertising blitz and media hype attending this Draft IIS's launch, the confused and confusing messages that have been put out by vested interest organisations such as the Forest Industries Association of Tasmania, the Forest and Forest Industry Council and the silver-dollar syncophants in the Launceston and Hobart Chambers of Commerce, as well as the glossy digitally enhanced pictures and the sheer weight of it won't end up bedazzling the minds and consciences of the Resource Planning & Development Commissioners as the proponents clearly intend.

But if that's what occurs, then I suppose they will have got their \$11M worth.

As with all manner of things, quality doesn't come in bulk.

Ignores alternatives:

I'm particularly concerned that this Draft IIS ignores a whole range of potential alternatives for a pulp mill, which could provide win-win outcomes.

Instead, the proposal is presented in such a way that Tasmanians are being pressured to accept this proposal as it is, without changes, because no other options are possible. To my way of thinking, this is like saying, rather childishly, that either the authors / proponents get their own way on every detail of the game, or else they're going to take their bat and ball and go play somewhere else.

It is a strategy based on bullying and emotional blackmail. How can it be respected?

On a number of occasions, I have placed on public record my support in principle for additional down-stream processing in the Tasmanian timber industry, and for the development of a pulp mill in Tasmania. So in many respects, I represent a middle ground in the mill debate - one that Gunns Ltd. and its supporters ought to consider.

I would like to take this opportunity to reiterate my support here in this submission, noting of course that it is not carte-blanche. It is not persuaded by bullying, or by emotional blackmail.

My support is provisional, and it depends upon:

- . the mill being a small to medium sized one
- . the technology being chlorine-free and closed-loop
- . the feedstock being 100% plantation-based
- . the mill being genuinely environmentally sustainable.

From the material provided in this Draft IIS, it appears that the proponents intend building a pulp mill that will be very large in anyone's book - and 'too large' in mine.

In this modern age, where quality rather than quantity is the talk of the markets, and where product-integrity and niche-marketing are more often perceived as the ways forward, it's really disappointing that this proposal is so up-sized, suggesting a matter of corporate ego rather than necessity, and that its basic technology heralds from the big-ugly-stinking 1950s era, with only some minor adaptations such as a lick of green paint, an extra long submarine effluent pipe, and a very tall smoke-stack by way of concessions to heightened public expectations.

The Draft IIS has failed to explore down-sized alternatives. In ignoring possible alternatives, it fails the Tasmanian people, who are eager to see their economy prosper, and fiercely determined to protect their unique natural environment.

Impact on native forests:

The Draft IIS informs us that the Gunns Ltd. pulp mill will require a continuation of native forest feedstock in the immediate and medium-term, and fails to address consequences.

This is simply not good enough. At least one study from the mid-1990s (ANU) showed that Tasmania's plantations were already of sufficient size and quality to support a small to medium-sized pulp and paper industry.

The impacts of native deforestation that will likely to be caused by this mill are a major concern. This appears to be a major flaw in the Draft IIS, and suggests a cynical political manipulation of the assessment process.

Despite the publicity surrounding the proposed pulp mill during the 2006 Tasmanian State election included media statements and advertising to the effect that "*... not one extra tree will be cut down for the pulp mill*", it now appears that the company intends operating its woodchipping facilities at Burnie, Triabunna and Longreach at even greater capacity during the coming years to help pay for the mill's construction, and that our island's biologically unique and precious native forests and rainforests will have to comprise most of that supply.

Is it any wonder that many Tasmanians question the integrity of this proposal?

By failing to look at where wood supplies will be coming from, and what effects these supplies may have on the social fabric or the environment, the Draft IIS has also failed to examine questions concerning what may happen in the event of wild fires destroying the company's plantations and wood production forests set aside under the Regional Forest Agreements.

Having seen previous instances of collusion between the State and Federal Governments and this sacred cow of a timber industry which have resulted in the transfer of large areas of native old-growth forests out of the public reserve system into wood production zones, it's not inconceivable that Gunns Ltd. or some other future operator will demand and receive access to our precious National Parks and the World Heritage Area (under threat of moving their pulp mill operations off-shore, a move sure to result in government capitulation).

I hope you will understand that this future possibility, remote and improbable as it might seem now, concerns me greatly.

Tasmania's native forests and natural landscapes are central to the reason why many people come here to Tasmania to visit, or like myself, to live. Our old growth native forests are only a remnant of what used to exist elsewhere in the world, and they are simply awe-inspiring. In the same way that St.Pauls or the Vatican inspires, these forests transcend our worldly experiences and enrich our lives.

They are not things that should be sacrificed.

Thankyou once again.

Yours sincerely,

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Dr. John R. Wilson

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