



Dr Andreas Ernst MB., BS., PhD., F.A.F.O.M. Dip. M.S.M.
Musculoskeletal Medicine
Occupational Medicine
Provider No: 0366647W
Ph: 03 6331 7711
Fax: 03 6331 7712

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Resource Planning and Development Commission
GPO Box 1691
Hobart TAS 7001

Dear Sir

Re: Response to Gunns Draft IIS

I would like to take the opportunity to provide the RPDC with my response to the recently released Gunns Draft IIS. I am providing this response despite the commonly held belief in the community that the pulp mill is a foregone conclusion. Particularly over more recent times, the confidence in the RPDC has been dented by community issues such as King Island plantations, Ralph's Bay development etc - all seen as pet projects of the Premier.

Despite these commonly held beliefs in the community, I am still hopeful that the RPDC will maintain neutrality and objectivity and look at the triple bottom line i.e. economics, environment and social evenly and fairly.

The Draft IIS contains more than 7000 pages. It took Gunns 18 months to prepare the document. More than 40 people were engaged. It took 350,000 hours to prepare at a cost of approximately \$12 million. It is impossible for any person, even the highly educated and professional, to even scratch the surface of such a voluminous document in only two months.

I dissected the document choosing air quality as an area which needed more detailed attention. From this, and a few other topics including odor, I concluded that the signal-to-noise ratio is rather unhealthy due to significant unnecessary noise obscuring the signal. This is further complicated by confusion due to unnecessarily complex presentation eg use of multiple units for one variable. In simple terms, one can express comparison of trees in units of meters, feet, inches etc. This makes it next to impossible to compare the data without taking the time to express all variables in one and the same unit.

I have chosen air quality for detailed analysis and would have liked to apply the same diligence to many other issues which are of concern to the local community eg:

- Ocean outfall and marine environment.
- Tourism and associated infrastructures.
- Traffic effects eg deaths, noise, pollution etc.
- Odor.

However, the nature of the IIS i.e. unfavourable signal-to-noise ratio, poor presentation, high volume etc, made this impossible. The reason for choosing air quality as the subject for more thorough analysis is as follows:

- The Launceston air quality is already poor.
- The Australian Medical Association, Tasmanian Branch, has concluded that the Launceston air shed cannot tolerate any more air pollution.
- It is officially acknowledged that there are already 8 additional deaths per year in Launceston from air pollution.
- From personal observation, living in Hillwood, and shared by other locals, we know that bushfire smoke typically rises into the air, gets subsequently channelled into the valley with a plateau effect, and eventually drifts right down into Launceston. We believe that there is high potential for serious worsening of mortality and morbidity from air pollution with additional pollutants from the pulp mill. We believe that the problem is not so much the polluter but weather patterns i.e. wind, inversion, topography of the valley etc. This particular situation cannot be changed through human intervention, ie we cannot change topography, wind patterns etc.

- Simple risk assessment methods use consequence and likelihood grids. We are concerned that for all consequences, including disaster, multiple death, single fatality, chronic disability and serious injuries etc, the risk figures do not stack up favourably when looking at the likelihood of these outcomes. For instance, we believe that the likelihood of disaster and multiple deaths is "*likely*" over the life of the plant (30 years).

The following summarises conclusions from the perusal of the relevant parts of the IIS, particularly the final report, Supplementary Air Quality Assessment of Proposed Pulp Mill, 8th August 2006, job number 2238, prepared by Pacific Air and Environment:

- The model, used for the IIS, does not meet US EPA acceptance criteria for most class one pollutants (only 2 out of 12). In other words, the model predicts correctly only 15% of the time.
- Only one station was used for validation with respect to all pollutants (except PM10, which was measured at another location).
- No data on PM 2.5 has been published.
- The model underestimates up to 600%, overestimates up to 500%.
- Despite the deficiencies of the model, an increase of air pollution in Launceston is predicted with up to 30% of air pollution from the pulp mill in summer. As far as mortality and morbidity is concerned, the total inhaled dose per year is relevant. Currently good air quality in summer does therefore not justify additional pollution from the pulp mill.

ASSESSMENT

Listed below are core conclusions and recommendations arising from the assessment of the Draft IIS:

- The model fails to predict using US EPA acceptance criteria.
- Any conclusions are therefore pure guess work.
- Several experts from Tasmania, the mainland and overseas, predicted significant impact from the pulp mill from pulp mill air pollution, particularly in Launceston. If our predictions are correct, and the IIS can't disprove that, there will be significant increase in deaths and mortality from pulp mill air pollution and other adverse impacts, in the Tamar Valley, eg traffic.
- It appears to us that the triple bottom line concept needs to be revisited. Whilst the Tamar Valley may be the best site economically, it is most likely not suitable from an environmental and social perspective.

- Tourism and small agri/aquaculture industry does not go well together with heavy industry. Once this valley has a reputation of smell, heavy log truck traffic and heavy industry, tourists will bypass it straight away. The social and economic consequences would be devastating. Proven examples include Newcastle, which turned from "*steel town, to style town*" after industry left, or Byron Bay, which prospered after closure of the smelly and polluting abattoir.
- The RPDC must seriously consider the above and be prepared to conclude that the choice of site is seriously compromised by the given fact of topography, wind and inversion whether, and that location of a pulp mill in the Tamar Valley has every potential to lead to an environmental and social decline, unless proven otherwise. The IIS lacks such proof at this stage.

Please do not hesitate to contact me if you wish to clarify any of the above.

Yours sincerely

Dr Andreas Ernst

Attachment: Copies of overheads used for presentation purposes

Cc: The Hon Ian Campbell
Minister for the Environment and Heritage
Parliament House
Canberra
ACT 2600