

T H E T A S M A N I A N P U L P M I L L N E W S

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DON'T PULP OUR FUTURE! GREENS LAUNCH SUBMISSION

The Tasmanian and Australian Greens delivered their joint submission to the Resource Planning and Development Commission (RPDC) on Monday 25 September, with just minutes to spare!

We understand the Commission was flooded with submissions on the Draft Integrated Impact Statement (IIS). *It has been reported that the RPDC received more than 700 in total.*¹ As the only political party in Tasmania which has vowed to protect this island from Gunns' rapacious mill plan, the Greens are very pleased so many concerned individuals and groups have contributed to this strong response.

With such a volume of submissions to read through and analyse, the RPDC certainly has its work cut out for it.

The Commission has announced it will hold its Directions Hearing from 10.00 a.m. on Wednesday 25 October in the Albert Hall, Launceston. This will be our first opportunity to ensure Gunns is called to account for the inaccuracies, shoddy 'science' and glaring gaps in its Draft IIS. Go to http://www.rpdc.tas.gov.au/projects_state_signif/pulp_mill/pm_docs/pm_whats_new.htm for more information on this aspect of the process.

Our own three volume submission critiqued the proposed mill in key areas, and concluded the RPDC must reject Gunns' mill plan in order to uphold the objectives of sustainable development, intergenerational equity and the precautionary principle.

The Greens' submission addressed health impacts and serious air pollution concerns; potential long-term harm to the marine environment; toxic chemical emissions; use of outdated technology; extreme adverse effects on fresh water, forests and biodiversity; economic and social concerns; problematic assessment methodology; and the likely opportunity cost to Tasmania if the Long Reach mill is approved.

We commissioned a number of independent experts to analyse specific areas of the IIS, with the emphasis on air pollution, transport safety issues and a thorough risk analysis and comparative economic assessment.

As you will read in the following pages, not just the Tasmanian environment is under grave threat; there is also a potentially huge social and economic cost.

The true face of the proposed mill is being revealed, and the proponent's shoddy groundwork has surely sown the seeds of this polluting mill's destruction. We must continue to work together to make sure it does.

Submissions may have closed, but the hard work has only just begun...

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RISK AUDIT REVEALS MILL DANGER

The possible extent of the risks posed by the proposed Long Reach pulp mill have been studied and analysed by Australian Risk Audit on behalf of the Tasmanian and Australian Greens.²

Australian Risk Audit identified *71 major risks in 12 different sectors*, the majority of which have either been ignored, or incorrectly quantified in the Draft IIS.

Air pollution equals high risk to health

Speaking at the public launch of the Greens' submission, a principal of Australian Risk Audit, Professor Andrew Wadsley said weak emission standards, coupled with weaker emissions modelling in the Draft IIS mean air pollution calculations are unreliable to model air dispersion and pollutant emission in the Tamar Valley air shed.

While the Draft IIS says there will be a 'negligible' impact on human health, Australian Risk Audit estimates the increase in chemical and particulate pollution will result in *between 31 and 55 premature deaths each year*. The risk audit team points out that the proponent's own assessment states their modelling falls outside of US Environment Protection Agency (EPA) acceptability criteria.

Toxic metals and dioxins

The risk analysts also state emissions of toxic metals such as Mercury and Manganese will significantly exceed US Clean Air guidelines, but the RPDC *Final Scope Guidelines* for the Gunns' mill proposal has set no emission control standards for these metals.

The analysts reveal the maximum monthly intake of dioxin – include background intake – for people consuming fish taken from near the effluent outfall will exceed the monthly intake standard set by the Commonwealth Department of Health and Ageing.

Zero-sum economics

Utilising the proponent's own Economic Impact Assessment, the risk analysts find the proposed Pulp Mill will *reduce Australian exports by more than \$800 million and increase foreign debt by \$4.2 billion in 2030*.

All this at the cost of our lucrative, prized clean, green brand. The risk audit team estimates this and the lifestyle cost to Tamar Valley residents would represent millions of dollars equivalent in lost value.

PEAK MEDICAL BODY REJECTS LONG REACH MILL

The Tasmanian branch of the Australian Medical Association delivered a damning assessment of the Draft IIS on the closing day of submissions to the RPDC.

AMA Tasmania went on the public record in February this year, identifying five public health issues that must be satisfied beyond doubt if the organisation was to support the proposed mill.

In a statement made on 25 September, AMA Tasmania said, *"The five public health concerns have not been satisfied beyond doubt at this time."* As a result, it said, **"AMA Tasmania does not support the proposed pulp mill."**³

The AMA Tasmania's Position Statement on the proposed mill highlighted the fact that Launceston has one of the worst air quality situations within Australia, particularly in winter with its air quality regarded as "seriously compromised."

With the proposed mill design producing an estimated 100,000 kg of particulate pollution from its stack each year, and incorporating the burning of wood or its by-products to provide power, the peak doctors' body in Tasmania is understandably concerned about the potential for increased sickness and death among Tamar Valley residents.

IIS predictions "highly unreliable"

Ultimately, the AMA Tasmania found the air pollution predictions used in the Draft IIS as highly unreliable.

The Position Statement asserts the Pulp Mill will release measurable amounts of so called Class One pollutants – small particles, sulphur dioxide and oxides of nitrogen – and others including inorganic chlorinated and reduced sulphur compounds.

A bad smell

AMA Tasmania also says, *"It is possible that people living or working more than one kilometre from the proposed Pulp Mill, including in Launceston, will be exposed to odour on more than five days a year."*

More dangerous roads

According to the AMA Tasmania, an elevated risk of road fatalities is the likely result of an increase in road traffic using current systems. The position statement says, **"... Tasmanians continue to be tragically reminded of the risk potential."**

To read Volumes 1 and 2 of our submission,
go to www.tas.greens.org and follow the links.

IIS SLAMMED BY GOVERNMENT'S OWN EXPERTS

"The assessment using effluent concentration by Toxicos (sic) is invalid and misleading...."

Wildlife and Marine Section, DPIW Internal Working Draft, 17 July 2006.

The Government's own Department of Primary Industries and Water (DPIW) has delivered a damning critique of the study done for Gunns by Toxicos consultants on the likely effects of exposing Bass Strait seal colonies to dioxin-laced effluent.

A leaked internal report criticises claims made in the report as "misleading", "inaccurate" and "unsubstantiated".⁴

The leaked report said, "Toxicos states that dioxins are not significantly bioaccumulated by fish. This statement is profoundly inaccurate, misleading and directly contradictory to references cited by Toxicos."

"It is suggested that Toxicos has demonstrated a complete lack of understanding of the meaning of the term **biomagnification** and inappropriate use of the term has been used misleadingly to suggest dioxins do not significantly **bioaccumulate** in fish," the report said.

Greens' Shadow Pulp Mill spokesperson Kim Booth MHA pointed out this strong internal criticism came to light shortly after it was revealed Toxicos had underestimated the pulp mill's potential marine dioxin release by 45 times.

CLIMATE CHANGE IGNORED

"Gunns' forecast impacts of its proposed pulp mill are fundamentally flawed..."

Australian Greens' Senator, Christine Milne, 29 September 2006

Reiterating what has become a common theme among independent experts and scientists; Greens' Senator Christine Milne has labelled Gunns' forecasts and assumptions as flawed.

Senator Milne said Gunns has completely ignored the long term effects of climate change over the 30 – 50 year life of the mill.

Speaking at the launch of the Tasmanian and Australian Greens' submission to the RPDC, Senator Milne said, "Climate change is forecast to make the north-east of Tasmania dryer, yet Gunns want to take 26 billion litres of water a year out of the ecosystem and pump it into Bass Strait as toxic effluent."

"In addition, the pulp mill energy plant would pump 40 million tonnes of carbon dioxide into the atmosphere, on top of the increased soil carbon emissions as a result of clearing forests, further adding to the burden of greenhouse gas emissions when Australia needs to reduce emissions."

"Tasmania's clean, green and clever industry direction emerged after the collapse of the Wesley Vale pulp mill and now underpins the State's economy. Gunns' pulp mill undermines this reputation..." Senator Milne said.

KRAFT GUIDELINES REVIEW STALLED

"At two yearly intervals, the Tasmanian Government will commission a report on developments in pulping technology and techniques..."

2004 Guidelines for any new Bleached Eucalypt Kraft Pulp Mill in Tasmania (C14)

The Tasmanian Government is required to re-examine the generic guidelines for a bleached eucalypt Kraft pulp mill every two years. A review is now due.

In Parliament on 28 September Greens' Leader Peg Putt asked the Premier, "Given that it is two years since the guidelines were finalised, have you commissioned a report on developments in pulping technology and techniques to determine whether there is indeed a need to review the guidelines, as you are bound to do?...if not, why not? Is it to give Gunns an easy ride with outdated and deficient standards for their pulp mill?"⁵

As a result of the Greens' questioning the government released a letter from RPDC Executive Commissioner, Julian Green, to the Premier, in which he wrote, "...the Commission recently commissioned Beca AMEC Ltd to prepare a study report...The Study Report indicated that there were no developments in pulping technology and techniques in terms of the bleaching process to suggest...the Tasmanian Guidelines...should be amended."⁶

As Peg later pointed out, "We fear that in effect this leaves the current deficient and out-dated standards in place and gives Gunns an easier ride to approval..."

SOURCE DOCUMENTS AND LINKS

1. *The Examiner*, 4 October 2006, p5.
 2. Tasmanian and Australian Greens, *Don't Pulp Our Future*, A Joint Submission to the RPDC on Gunns' Pulp Mill Proposal Draft IIS, Volume 2.
 3. Australian Medical Association Tasmania, *Sick Mill Says AMA*, Media Alert, 25 September 2006.
 4. Wildlife and Marine Section DPIW, *Response to Toxicos, Comment on Bell Bay effluent and potential impact on nearby seal colonies*, Internal Working Draft, 17 July 2006.
 5. Hansard, Parliament of Tasmania, 10:13 am, 28 September 2006.
 6. Green, Julian, RPDC Executive Commissioner, *Report on developments in pulping technology and techniques*, letter to Premier, 9 September 2006.
 7. Tasmanian and Australian Greens, *Don't Pulp Our Future*, A Joint Submission to the RPDC on Gunns' Pulp Mill Proposal Draft IIS, Executive Summary, Vol 1.
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 - Putt, Peg, Tasmanian Greens' Leader, Media Release, "PULP MILL ENVIRONMENTAL STANDARDS REVIEW REQUIRED BY LAW", 28 September 2006
 - RPDC Integrated Assessment Process for Gunns' pulp mill proposal - <http://www.rpdc.tas.gov.au/projects_state_signif/pulp_mill/pm_dwnl/Integrated_Assessment_Information_Brochure_130706.pdf>

OUR SUBMISSION TO THE RPDC - Some Key Points

1. The Greens are unconvinced by the proponent's claims of only minor or negligible health impacts from 100,000 kg of particulate pollution from mill stack into Tamar Valley air shed each year. Concerns shared by independent experts and scientists.
2. The likely effect on the marine environment of at least 73 million litres of toxic, dioxin-laced effluent released daily is of unacceptable potential harm to slow-flushing Bass Strait. The Greens are particularly concerned about the accumulated pollution load over the 30-50 year mill life; not addressed in the Draft IIS.
3. A myriad of toxic compounds would be produced, stored and disposed of on-site, while other harmful chemicals would also be disposed of as landfill off-site, or expelled either as emission or effluent in significant quantities. The Greens believe it is unacceptable to release any quantities of these substances into the environment.
4. The intended use of Elemental Chlorine Free (ECF) technology will ensure the mill pollutes land, sea and air. ECF is not world's best practice. Total Chlorine Free (TCF), closed loop, plantation-fed mill technology is available and world's best practice.
5. The extraction of 26 billion litres annually of fresh water from the South Esk catchment represents a massive exploitation of a public resource at a level which is surely unsustainable.
6. Gunns is not required to assess the impact on our publicly-owned native forest estate of logging to produce up to 4 million tonnes of feedstock woodchips each year. High conservation value forests of North and North-East Tasmania are being targeted by Gunns to feed its mill, placing forest dependent species and biodiversity values at risk.
7. The negative social impacts of intensified plantation establishment on rural communities are seriously underestimated in the Draft IIS, as are questions of water supply for towns near plantation estates.
8. Proponent and Forestry Tasmania have signed a secret 20-year wood supply deal, compromising both the assessment and assertions over wood supply in the Draft IIS.
9. Gunns' revelation of certain road fatalities due to increased log truck and heavy machinery traffic is unacceptable.
10. Independent experts and scientists have raised serious questions about the methodology and assertions made in the Draft IIS. There is a growing consensus key aspects lack scientific rigour and credibility.⁷

WHAT YOU CAN DO - A united, informed community can defeat this mill.

Keep the pressure on your MPs

For contact details of Tasmanian MHA's go to:
<http://www.parliament.tas.gov.au/ha/halist.htm>

Contact the media

Letters to the editors and calls or e-mails to talk-back radio make a big difference. This helps decision-makers gauge public opinion PLUS maintains community debate

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Tasmanian Greens State Parliamentarians, from left. Tim Morris MHA (Lyons), Peg Putt MHA (Denison), Nick McKim MHA (Franklin), Kim Booth MHA (Bass)