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Att: Hon Malcolm Turnbull MP, Federal Member for Wentworth and Minister for the Environment and Water Resources and the EPBC Unit

From: Gillian Marsden, Launceston Environment Centre.

Date: August 27, 2007

Re: Proposed Pulp Mill near Launceston

Sent by email to: malcolm.turnbull.MP@aph.gov.au
epbc.pulpmill@environment.gov.au

Dear Minister

Thank you for the opportunity to comment further on the proposed pulp mill near Launceston.

We believe the process is now so limited that our ability to comment further is highly restricted.

What the public has been able to comment on has been slowly chipped away. This will be our fifth submission on the proposed pulp mill. Originally, we were able to provide input and comment on all the socio-economic and environmental issues associated with the mill. Now, we merely have an opportunity to comment on the 24 issues your department has identified for consideration before granting final approval.

None of the conditions you have outlined in the interim-decision will satisfy our organisation that the proposed mill will not significantly impact upon matters protected under the terms of EPBC.

There is a vast amount of data and literature available to show that the proposed mill is a polluter of such magnitude that no amount of conditions will prevent significant damage to matters covered by the Act.

A brief perusal of Dr. Stuart Godfrey's paper *Inadequacies in the Hydrodynamic Modelling performed for Gunns Pulp Mill IIS* should have been enough for your department to reject out-right the design of the proposed mill.

Dr. Godfrey's report is scathing of the Gunns Hydrodynamic modeling stating that:

the observations they [Gunns] took were not, and could not have been, used in any effective way to test the validity of the assumptions they made in building their hydrodynamic model [and pollution] will almost certainly reach nearby Commonwealth waters [and] possibly harm[ing] commercial species found in Commonwealth waters.¹

How much more information does the Commonwealth require to rightly argue that the proposed mill has failed to meet national/international environmental guidelines?

As we demonstrated in our submission to you in the last EPBC² round, there is a fundamental flaw in the entire IIS written by Gunns. Your ability to accurately judge impacts due to this flaw is impossible.

In that submission we say:

¹ Dr. Stuart Godfrey, *Hydrodynamic Modelling performed for Gunns Pulp Mill IIS* from http://www.cleantamar.com.au/pdf/pulp_mill_analysis.pdf viewed on August 27, 2007.

² See LEC Submission to EPBC Referral 2007/3385

Inadequate Risk Assessment

It is difficult to assess adequately the level of environmental impacts from the proposed pulp mill due to the inadequate risk assessment presented by in the IIS documentation.

Within the existing documentation, the IIS methodology is neither specifically defined nor justified with literature.

There are a number of drawbacks to this approach. Firstly, the relationship between impacts is not clear.

This includes the relationship between different environmental impacts, but also the relationship between environmental, social and economic impacts, which cumulatively could have a greater impact when combined than taken separately.

The criteria used to evaluate the impacts are not always compatible, as they are not ranked or defined and are imprecise in their calculation of impact.

As a result, the number of categories to be reviewed is immense thus distracting from the most significant impacts, and preventing an adequate distilling and appreciation of:

- A. the real impact; and
- B. the most appropriate mitigation strategy.

Finally, this means that rather than being an example of world's best practice, the identification of effects becomes qualitative and subjective (Westman 1985).

The IIS approach taken does not stand up to scrutiny according to established methodologies for EIA worldwide. There are two areas that need further analysis in relation to the methodology chosen (i) the EIA method chosen for the entire available documentation, and (ii) the impact and ranking methodology.

Therefore, after considering the available documentation, the LEC argues that the referral documentation does not demonstrate to the Commonwealth that there will be no significant impact upon either matters of national environmental significance or upon Commonwealth marine areas.

It is impossible for the IIS to demonstrate no impact because the methodology employed is confusing and with no ranking of impacts fails to allow a true appreciation of impacts to be made.

It is not possible to determine with the methodology used that there will be no impact on commonwealth environmental matters.

Therefore, any claim made in the referral documentation that there will be no significant impact upon matters protected in sections 18, 20 and 23 of the EPBC Act is wrong...

From Launceston Environment Centre submission to EPBC Referral # 2007/3385

Therefore, we submit from that basis, your department should have informed Gunns that their ability to determine risk was flawed, could not be relied upon and they have failed to show that the project would not have a significant impact upon matters covered by EPBC.

Your decision to provide an interim-approval, despite being provided with information demonstrating significant flaws in Gunns' IIS documentation, is astonishing. Any disagreement your department has with our findings should have been explained. They were not and we suspect our submission was not actually read in any great detail.

Therefore, your decision leaves us with little confidence that anything we now say will be considered in your final decision.

Furthermore, we cannot see, beyond a few token issues, where any comments that we have made in the last two years have been taken into account by any tier of government. We are an organisation that has access to significant amounts of expertise and this has consistently been dismissed. For example, we have recently sent you a copy of an economic report from our Tasmanian Roundtable for Sustainable Industries Project but have heard nothing back from you.

In that report, we demonstrate that the rhetoric about the mill being good for the economy and job creation in Tasmania is false.

To date, no economic risks analysis has been conducted by either Gunns or the Tasmanian government. The jobs boom in our state is from developments in the new economy such as services, tourism, fine foods and wines, not 1950s style resource intensive industries such as forestry.

As the environment has been protected employment in Tasmania has grown. Figure 1 below shows how the economy of Tasmania has changed dramatically since the early 1990s when significant job losses were incurred in resource intensive industries.

Although we understand this is out of your ambit under the terms of the EPBC Act, you should make decisions based on the full knowledge of what is happening in Tasmania.

A clean green economy GROWS jobs

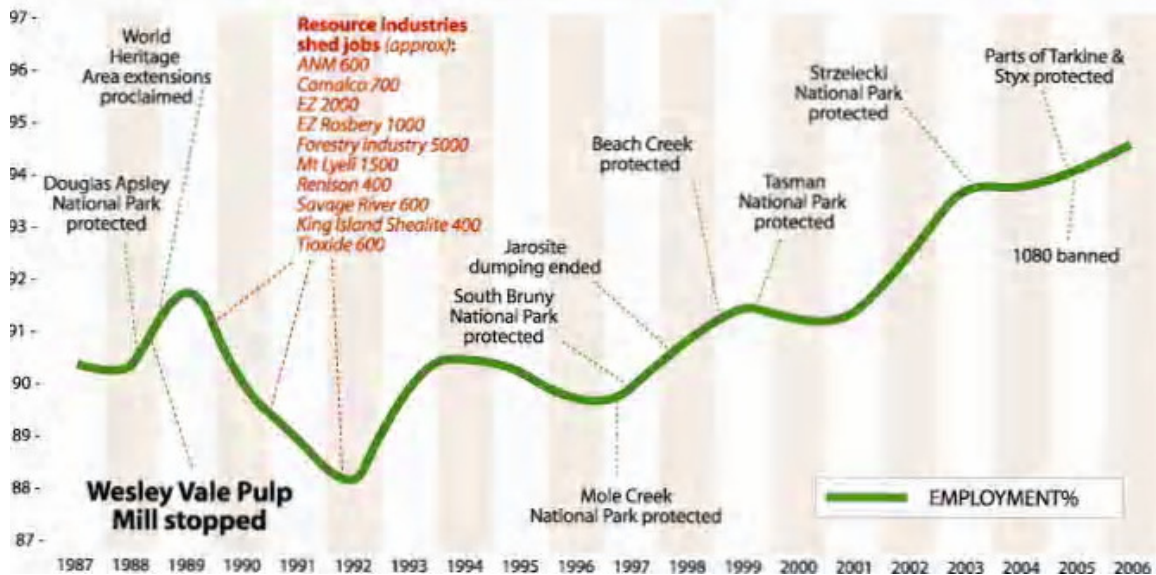


Figure 1 (Source: IFT, 2007)

As you know, the whole pulp mill proposal has caused significant distress to a majority of Tasmanians. Your government has played a significant role in creating that distress. We now believe that any submission phase is pointless and so badly discredited that significant reconciliation work will have to be conducted by all tiers of government to demonstrate that it is worth taking part in such processes again.

It appears on the surface that our expertise and contribution to the debate has been ignored at every point by both the Commonwealth and the Tasmanian governments in the pulp mill approvals process.

This is not only disappointing but also un-Australian. All sectors of the community should be given a fair go.

Yours sincerely

Gillian Marsden
LEC Chair Person