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Gunns Limited

## **Bell Bay Pulp Mill Draft IIS**

Environment and Community Group  
Interview Report

March 2006

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# 1. Introduction

GHD were appointed to widen the Gunns consultation process undertaken by interviewing key community representatives and environmental/community organisations identified in consultation with The Wilderness Society. Specifically, community representatives and organisations were invited to discuss specific issues and opportunities associated with the Pulp Mill proposal. The purpose of the interviews was to document the perspectives of a broad range of interest groups and to include this information in the Draft IIS.

Prior to each of the interviews, the following information was provided to the interviewees:

- » *GHD have been engaged as independent consultants to prepare an Integrated Impact Statement (IIS) for the proposed Bleached Kraft Mill in Northern Tasmania. The IIS considers the economic, environmental and social impacts of the proposal.*
- » *Gunns are managing the public consultation and communication process as part of the IIS development. Focused consultation with interest groups is being managed by GHD. This interview forms part of this process.*
- » *A summary of these interviews and key issues and opportunities identified will be included in the IIS report. Members of the IIS technical team will also be asked to respond to the issues raised as part of the IIS reporting process.*
- » *Individual names and contact details will not be provided to Gunns but may be provided to the RPDC if further information is required during the IIS assessment process.*

The interviews contained a series of questions designed to identify issues associated with the current proposal while also providing a context to the response. The interview format was semi-structured and undertaken by two members of the GHD team. The interviews were completed in September and October 2005. Fifteen interviews were completed as part of the supplementary consultation process.

*It should be acknowledged that some interviewees did not feel comfortable, qualified or adequately informed to answer some questions so these were excluded from the process.*

The questions asked were:

1. What does your organisation believe to be the unique environmental qualities of Northern Tasmania?
2. Does your organisation have an opinion or any comments you would like to make on Gunns Limited and their operations?
3. Does your organisation support or not support the proposed Pulp Mill and why?
4. What does your organisation understand to be the advantages of the proposed Pulp Mill?

5. What does your organisation understand to be the disadvantages of the proposed Pulp Mill?
6. What does your organisation consider to be the environmental issues or risks associated with the proposal?
7. Does your organisation have any recommendations as to how the current Pulp Mill proposal could be improved?

## 2. Participants

Thirty-seven (37) organisations and individuals were invited to participate in the supplementary consultation process. The majority of these groups were identified in consultation with The Wilderness Society, while the remainder were identified by organisations and individuals originally contacted by the GHD Consultation Team.

The following organisations and individuals were invited to participate:

Organisation/Individual	Accepted	Declined	No Response
The Wilderness Society	Ü		
Australian Conservation Foundation			Ü
Greenpeace		Ü	
Tarkine National Coalition			Ü
Friends of the Blue Tier			Ü
Reedy Marsh Forest Protection Group			Ü
Tasmanian National Parks Association			Ü
Mount Arthur Environment Management Group			Ü
Tasmanian Conservation Trust		Ü	
Doctors for Forest	Ü		
Beaconsfield Action Group			Ü
Tasmanian Clean Water Network			Ü
Landcare		Ü	
Australian Maritime College			Ü
Launceston Water Catchment Group			
Tasmanian Beekeepers Association			Ü
Weymouth Progress Association			Ü
Australian Branch of Medical Association			Ü
Womens Health Network Tasmania			Ü
Tamar Valley Semaphore Association			Ü*
Recherche Bay Protection Group	Ü**		
Tamar Valley Residents Action Committee	Ü		
Launceston Environment Centre	Ü		
Great Western Tiers National Park Campaign			Ü
The Tasmanian Greens – Peg Putt	Ü		

The Tasmanian Greens – Senator Christine Milne	Ü	
The Tasmanian Greens – Senator Bob Brown		Ü
Australian and New Zealand Clean Air Society	Ü	
Environment Tasmania		Ü
University of Tasmania - Launceston Environment Committee	Ü	
University of Tasmania - Hobart Environment Committee	Ü	
Golden Valley Community	Ü	
South Sister		Ü
South East Forests Protection Group	Ü	
Christopher Strong	Ü	
Tasmanian Fishing Industry Council	Ü	
University of Tasmania – Paul Smith	Ü	

*\* The letter to the Tamar Valley Semaphore Association was misplaced and a response was not forwarded to GHD until after the consultation process was closed.*

*\*\* The Recherche Bay Protection Group accepted the invitation to participate in the consultation process but were unavailable at the agreed time.*

## 3. Issues Summary

The following section provides a detailed summary of the breadth of issues discussed during the focused consultation process. These issues have been clustered into appropriate themes and paraphrased where appropriate. The interview transcripts have been provided in Appendix A of this report.

### 3.1 Tasmanian Forestry Issues

- » Current forestry practices are destroying environmental tourism in Tasmania.
- » Tasmanians need to protect old growth forests.
- » Consideration needs to be given to value adding enterprises.
- » Tax breaks favour the forestry industry over other industries as the 2020 vision removed any level playing field.

### 3.2 Wood Resources for the Pulp Mill

- » The immediate resource catchment of the proposal includes a number of old growth and high conservation forests, which should be protected.
- » Gunns have a desire to continue to access native forests for wood supply in the Pulp Mill process.
- » There is already pressure on native forests in Tasmania with Gunns indicating an increase in woodchip production.
- » The Pulp Mill would encourage the conversion of more native forest areas to plantations.
- » Consideration of the resource is essential to the proposal because the type of resource determines the technology needed for the bleaching sequence and hence the wastes generated.
- » The Pulp Mill is not the best use of plantation resource in terms of value adding and jobs.
- » Tasmania will transform into a “tree farm” to support the proposed Pulp Mill’s operations and it is questionable as to how long the land can support these tree “crops”.
- » Restoration of forested areas and the ceasing of logging activities in disputed areas need to be considered.
- » Additional forested areas could result in other rural enterprises losing land and therefore reducing production.
- » The proposed 30-year life span of the Pulp Mill, based on the destruction of forest ecosystems, undermines any revision of the Tasmanian Regional Forests Agreement.

- » Plantations impact on biodiversity, water supply, quality and use, due to the use of chemicals, pesticides and fertilizers in water catchments areas.
- » An increase in plantation as a result of the proposal would result in reduced flow into the Tamar and Esk Rivers and the adversely change in the water chemistry in these river systems.
- » The Pulp Mill will facilitate the continued clear felling of native forests and plantations causing massive soil damage, waterway damage and air pollution from subsequent burning.
- » Products which are higher in value than wood chips and pulp would result in less environmental issues, spread the wealth amongst the Tasmanian communities and create more jobs.

### **3.3 Waterways**

- » An increase on sediment loads in waterways as a result of the proposal could affect biodiversity, specifically in the Tamar River.
- » Testing, sampling and mitigation measures need to address concerns that the dredging of the Tamar River to construct the wharf will have an “incredible impact”.
- » Dredging of the Tamar River would have adverse effects, disturbing a thick layer of silt that would become suspended particulate matter and may have high levels of heavy metals.
- » Dredging will impact marine and aquatic environments, not only the northern areas of the Tamar River, but also down to Launceston.

### **3.4 Wastes**

- » The toxic sludge produced during the pulping operations, which contain dioxins, are difficult to dispose of and break down.
- » The Pulp Mill’s solid wastes when disposed in landfill will be stored indefinitely as concentrated hazardous materials.

### **3.5 Tourism and other Lifestyle Impacts**

- » A high ratio of natural resources to population in Tasmania gives good opportunities for outdoor recreational activities. These conditions must be maintained, as they are essential for the tourist industry and for the quality of life of Tasmanians.
- » Health and environmental impacts associated with pulp mills are not well documented and the precautionary principle should be used.

### **3.6 Flora, Fauna and Biodiversity Impacts**

- » The Pulp Mill's inputs would entail the irremediable loss of native vegetation, (particularly through clearance for plantations) which is essential for maintenance of biodiversity.
- » The Pulp Mill reduces marine biodiversity because its effluent incorporate toxic chemicals, with some components known to be cumulative.
- » Harvesting of 'forest residue' from coups to fuel the proposed wood-fired power station is recognised as a risk to biodiversity and is not greenhouse neutral.

### **3.7 Air Quality**

- » There are already significant problems with air quality, associated with atmospheric inversion in the Tamar Valley
- » Increased particulate emissions associated with the proposed Pulp Mill are a significant issue.
- » In 1989 the Tamar Valley was ruled out, as a potential Pulp Mill site, because of atmospheric inversion conditions and the impact on air quality. These issues remain relevant today.
- » Important that the air monitoring and sampling be conducted over a 12 month period from a minimum of five sites with proper equipment and methods being utilised.
- » Air sampling methods need to be amended, reducing the technique from PM2.5 sampling to PM10.
- » The air quality is severely degraded in the urban areas of the Tamar Valley due to wood burning for heating, industry should not be adding to these conditions.
- » Odour is potentially a major issue that the community may not fully appreciate.
- » Concern that full assessment and analysis of odour impacts is undertaken.
- » Dioxin emissions are of great concern to the community, more definitive assessments need to be done.

### **3.8 Marine / Aquatic Ecosystems**

- » Downstream negative effects on the marine environment that may occur as a result of the mill could have a "quite extreme" impact upon the fishing industry.
- » The seafood industry should not have to subsidise the proposed Pulp Mill by paying for lost or damaged markets due to degraded habitats.
- » Gunns should be accountable (for impacts on the seafood industry) and implement the most environmentally friendly technology available.
- » Need to investigate the costs of developing a better Pulp Mill against the risk of lost income from the seafood industry.

- » Marine pollution and outfall content can adversely affect *bivalves* such as oysters, as they are filtration feeders and bio-accumulate toxins.
- » Marine organisms are highly susceptible during their larval stages and any type of exposure to pollutants may lead to deformities and death.
- » A whole of catchment management approach is needed to minimise negative effects on the fishing and seafood industry.
- » If any pollution of the Bass Strait reduced seafood quality or yields, it could potentially have a huge economic impact on Tasmania.
- » The community cannot quantify the impact on marine life and do not have the facts and figures associated with specific proposals to make truly informed decisions.

### **3.9 Effluent Ocean Outfall**

- » Effluent from the Pulp Mill will impact on marine health and biodiversity.
- » Marine habitats, including abalone and rock lobster populations, will be adversely affected by the large amounts of effluent discharged into the ocean.
- » Concern that effluent discharged into Bass Strait could flow back into Tasmania on the east coast.
- » The circulation pattern in Bass Strait will mean that the effluent not only impacts on the biodiversity of Bass Strait but also sensitive coastal areas of Victoria such as Wilsons Promontory.
- » Effluent and gaseous wastes incorporate toxic chemicals, with some components being known to be cumulative, directly threatening people's health.
- » Effluent from the Pulp Mill will have a major impact on dive tourism and fisheries, especially around the Low Head area.
- » The water discharged after the pulping process must be polluted otherwise the process would be a closed loop.
- » There are two issues with the disposal of effluent;
  - The various chemicals released such as organochlorins, and
  - The compounds coming out of the eucalypt wood and reacting with the Pulp Mill process having unknown adverse impacts on the environment.
- » The toxins in the effluent will build up in marine animals and bioaccumulation will render them unfit for human consumption impacting on the seafood industry.
- » If the effluent outfall has to be four kilometres out to sea, there must be something wrong.

### **3.10 Industrial Process (including Bleaching and use of Chlorine)**

- » Due to the potential for adverse environmental impacts, no persistent organic pollutants (POPs) should be used in any processes for the Pulp Mill.

- » The use of chlorine is a serious problem and the impacts associated with its use and specifically the potential impacts on health are well documented.
- » Taking out chlorine from the Pulp Mill processes would result in more options to deal with the waste and close some of the effluent loops.
- » Using plantation woodchips instead of native forest significantly reduces the bleaching requirements of the Pulp Mill production process.

### **3.11 Transport, Roads and Traffic**

- » There are issues with an increase in log trucks on the road, as a result of the proposal and the subsequent effects on;
  - Road infrastructure, and the
  - Safety of other road users.
- » Funding for road maintenance associated with the increase in traffic will need to be addressed.
- » An increase in road traffic as a result of the proposal will increase the danger to wildlife.
- » Increased logging operations will force animals out of their habitats becoming increasingly vulnerable to truck traffic.

### **3.12 Alternative Site / Bell Bay Site Issues**

- » It has not been clearly explained as to why the Bell Bay site was selected without there being a comprehensive assessment of both sites.
- » The alternative site proposed at Hampshire would be more appropriate as it could be fully plantation-based and potentially chlorine free.
- » The Hampshire site was “purpose built” for a Pulp Mill with no air quality issues.
- » The Tamar Valley has become more residentially focused and heavy industrial development on the Tamar estuary is no longer appropriate.
- » Impact of the proposal on the tourism industry, in particular the successful wineries in the Valley.
- » The siting of the Pulp Mill is wrong, particularly in relation to the impact of the emissions on the Tamar Valley air shed and its inversion layer conditions.

### **3.13 Water Consumption and Supply**

- » Water supply for the proposal is an issue.
- » The proposed Pulp Mill will have water consumption issues unless it is a closed loop system.
- » Plantations and their continued development impact on water supply, quality and use.

- » It needs to be considered, through a cost benefit analysis, whether the water from South Esk River could be used in more beneficial ways.
- » The Pulp Mill proposal has failed to engage with the Federal Water Initiative process.
- » There is already a scarcity of fresh, clean water in the state without the demand for massive quantities to be used in the proposed Pulp Mill.
- » Water is increasingly being compromised in Tasmania.

### **3.14 Employment Opportunities / Issues**

- » The Pulp Mill will see twice the amount of wood chips produced in Tasmania but will halve the number of jobs as compared to jobs five years ago.
- » There are few long-term jobs associated with the very highly mechanised chipping and pulping activities.
- » There is little work after plantations are established.
- » The Impacts of Chlorine Dioxide (CD) on worker safety requires stringent worker safety measures, as CD is an extremely hazardous and volatile chemical.
- » Gunns' track record on worker safety is questionable.
- » Tasmanians are continually promised jobs associated with the forestry industry but the automation of the industry has meant actual job numbers have decreased.

### **3.15 Information and Propaganda**

- » The claim that this proposal would be the world's greenest Pulp Mill is just part of a media strategy.
- » The title of the proposal should be more representative of the actual location.
- » Official websites for the proposal had inaccessible information and incoherent information regarding the Pulp Mill Task Force (PMTF) bus and its locations.
- » The current proposal for the Pulp Mill does not include any alternatives and therefore the community is unable to consider these.
- » There has not been enough information given to the community to make an educated and informed decision on the proposal.
- » There has not been enough information given on alternative technologies available for the processing and bleaching of pulp.
- » There is a general lack of transparency in Gunns' operations.
- » It has been difficult to determine "fact from fiction", with information disseminated by Gunns being extremely misleading.
- » Gunns' approach was to use other individuals and organisations with whom they are associated with to disseminate information, for example "Timber Communities Australia" rather than directly answer any questions themselves.

- » The photomontage of the proposed mill was misleading, as the site works would be much larger than it appeared in the diagram, with it not being drawn to scale.
- » Huge advertising campaigns, created “false notions,” especially in relation to employment generation and the operation of natural systems.

### **3.16 Consultation Process**

- » The community has had no role in the decision-making associated with the options.
- » The original proposal canvassed in June 2004 had two options, and then one was taken off the table without any explanation or feedback to the community.
- » Tasmanians are very cynical about consultation processes and feel that many government decisions do not reflect the needs of the broader community.
- » Members of the community are disillusioned by the public consultation process initiated by government.
- » There is a general lack of trust of Gunns and the Tasmanian Government in matters concerning the forest industry.
- » Gunns could have been more proactive at an earlier stage in undertaking appropriate levels of consultation with the local community on the impacts associated with the Pulp Mill proposal.
- » There is a lot of suspicion in regard to the community consultation that has been completed so far by Gunns.
- » It is important that youth are engaged in a special way on this issue because these types of decisions impact on long-term equity.
- » The proposal has destroyed certain community standards and expectations, as highlighted by Taxpayer funded promotion caravans (PMTF).

### **3.17 Changes in the Proposal**

- » The changes in the proposal had resulted in confusion in the community with people unsure as to what was actually being proposed.
- » The current proposal is not regarded as concrete and it is expected that another draft or version of the proposal will be put forward.
- » The changes to the proposal that have occurred to date are a “form of manipulation”.
- » It is deemed inappropriate that Gunns submitted a Revised Project Scope on the day public submissions to comment on the draft guidelines closed.
- » Changes to the proposal created suspicion in the communities as to what the proponent will do next.
- » The changes to the proposal have resulted in misleading information being provided by the PMTF, Gunns and the government.

- » The process of changes to the guidelines and the proposal, on the last day that public submissions were allowed to the RPDC, was a cynical ploy designed to stifle public input.
- » Having spent so much money on a proposal, it would be extremely poor if the end result were different to what the community expected.

### **3.18 IIS Process**

- » The IIS is not actually “integrated” as there is no assessment of the biodiversity impacts of the use of native forest resource.
- » The IIS should be expanded to consider forestry operations, as the issue is the unsustainable nature of the whole industry and how the current resource base will support a Pulp Mill.
- » The impacts of the proposal are of national significance with other states also possibly being impacted; therefore a national independent body should assess the IIS.
- » The IIS is running ahead of the project management process.
- » The approvals process for the Pulp Mill proposal was inadequate because the guidelines were not diverse enough to encompass the decision making process at the political level.
- » The approvals process did not allow Tasmanians to deliberate coherently on any developments and on their impacts in the long term.
- » The Pulp Mill proposal should be placed on hold until the state of developing public opinion becomes clear.
- » The IIS process has not been transparent, as the community does not have a great enough understanding as to what is happening.
- » The community were able to make submissions (to the Federal Department of Environment and Heritage) during the Christmas/New Year period and some of those days in that two week period involved a number of public holidays, resulting in a shorter public submission time.

### **3.19 Tasmanian Government Role**

- » There needs to be more and clear separation and transparency between Gunns and Tasmanian Government and their respective roles in regard to the proposal.
- » The proposal has reinforced the view in the community that the current agenda in Tasmania by the State Government is “development at any cost”.
- » The Commonwealth involvement in the assessment will be a positive outcome, as the process was so politicised in Tasmania.
- » It appears that whatever Gunns requests of the State Government, it will be granted.
- » There are mixed messages being given in regard to the proposal

- » Tasmanian Government and Gunns appear to be the same voice.
- » The community needs to be able to trust what the government is saying about the proposal and the government should be seen to be at “arms length” from the proposal.
- » Many commercial groups do not have a common view on the proposal or sufficient information to inform a position, and may not regard it as prudent to question such an obvious commitment by a government.

### **3.20 Tasmania’s Strategic Direction**

- » The IIS should be assessed as to whether the Pulp Mill is in line with Tasmania’s strategic direction and goals, i.e. the key objectives of the Resource Management and Planning System, the Commonwealth Government Sustainability Indicators as well as being assessed against the Tasmania Together benchmarks and goals.
- » The Federal government was committing a lot of money into redirecting the forestry industry away from native forest logging and this Pulp Mill proposal was clearly not aligned with this initiative.

### **3.21 Economic Impacts / International Sales / Trends**

- » Question as to whether the proposal could compete with those of the same scale in other countries (eg Uruguay and China) as labour inputs and inputs of raw materials were likely to be both cheaper in other countries.
- » Changing customer policies are swinging towards policies such as Mitsubishi Paper Mill’s new woodchip buying policy in buying woodchips only sourced from plantations or second growth forests.
- » Market fluctuations could undercut the viability of the whole project and hence jobs, as seen in Canada, where when pulp prices have dropped and mills have shut down.
- » This proposal would lock Tasmania into an “old undifferentiated bulk commodity market” rather than the alternative of diversifying into high value low volume products.
- » “No sense” for a small economy to be so vulnerable to global pulp markets, the global market for chemical pulp is highly volatile with the price trend being downward for the past 20 years.
- » There is the danger that control over the Tasmanian land; water and forests dedicated to the Pulp Mill would flow to a foreign investor if Gunns were to pass on ownership of the Pulp Mill in the future.
- » If the Tasmanian economy does not diversify and the global markets for forest products crashed then this would be felt throughout many communities in Tasmania.
- » There is suspicion in the community that economic modelling for this proposal has not been appropriately validated.

- » The proposal requires a total accounting exercise, inclusive of features relevant to the community, government and environment; otherwise it does not stack up and is not worthy of support.
- » There is a “tough international market” for pulp with stringent market and commercial realities to comply with resulting in economic pressures to this proposal that may not always allow the best technologies to be utilised.
- » The proposal locks Tasmania and its resources in an ongoing relationship with one major customer, which raised issues in terms of competition as well as the issue of “cross-subsidisation” between Gunns and Forestry Tasmania.

### **3.22 Gunns Social Responsibilities**

- » “Gunns have failed to meet the Tasmanian community’s reasonable expectations regarding environmental performance”.
- » Being one of the largest companies in Tasmania, Gunns should have a greater commitment to sustainable and environmentally sensitive activities in that state.
- » Gunns have a monopoly in Tasmania, with many of their activities “legal, but morally wrong”.
- » Community members feel intimidated by Gunns as many livelihoods are dependent on Gunns’ operations in some form.
- » There was a perception in the community that tenders and/or employment may be pulled from the local population, further creating intimidation or fear.
- » Gunns’ practice of buying up large areas of farmland and converting that to plantation prevents farmers from being able to expand their land holdings.
- » This conversion of farming land adversely impacted on communities and community networks as farming families moved away from the area.
- » A disadvantage of the proposal is the potential social damage, impact on the “pillars of society” and the disregard for the public good.
- » Due to the misinformation, lack of leadership and lack of openness, the community is now divided over the issue, which is hugely damaging and irremediable.
- » Attempts should be made to mitigate effects on the social and community values of the area as much as is feasible.
- » This powerful company has been able to distort political and regulatory processes.

### **3.23 Community Services / Social Issues**

- » Northern Tasmania is already chronically under-serviced in terms of community services housing, hospitals, roads and other services.
- » Need for new housing and community infrastructure for the Pulp Mill workers during the construction phase would have major impacts locally.

- » If a construction camp is constructed, the sourcing of workers and supplies from interstate and overseas for such a large-scale camp may result in lost opportunities for local businesses.
- » There would be social impacts associated with a predominantly male construction workforce.
- » Significant difference between old growth forests and plantation areas has impacted on communities and landscape values.
- » The fragmentation of communities from this proposal and Gunns' activities as changing as people move out of rural communities.
- » Economic development may occur in the short term but is not true for the long term, because any such success encourages the population to grow further which then renews the need for more development.

### **3.24 Pulp Mill Design Issues**

- » The scale of the Pulp Mill is too large. A small-scale "boutique" mill that was closed loop and chlorine free was preferable as it aligned with Tasmania's "clean green" economy.
- » The Pulp Mill proposal should be purely plantation based, chlorine free and that a paper mill should be an integral part of the proposal.
- » A Pulp Mill of the type, size and period of operation proposed by Gunns "would reduce quality of life and perpetuate the loss of the integrity of our Natural Environment".
- » The proposal is not "clean" or "green" or "best practice" as the Pulp Mill is not chlorine free or using closed loop technology.

Appendix A  
**Interview Reports**



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Rev No.	Author	Reviewer		Approved for Issue		
		Name	Signature	Name	Signature	Date
0	A. Hubbard	S. Walker	*	S. Walker	*	21/10/05
1	N. Cunningham	S. Pascoe	*	S. Pascoe	*	4/11/05

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