

21 August 2008

The Hon Peter Garrett AM MP
Minister for the Environment, Heritage and the Arts
PO Box 6022
House of Representatives
Parliament House
Canberra ACT 2600

Dear Minister

Gunns Pulp Mill Approval EPBC 2007/3385 - Schedule 1 Maps

I write in relation to the above approval issued to Gunns Limited on 4 October 2007 for the construction and operation of a pulp mill at Bell Bay, Tasmania, and specifically the site maps in Schedule 1 of the approval.

The approval's Schedule 1 maps define the project area, and the approval requires the action to be as per those maps.

We have been undertaking ongoing negotiations with landowners and other stakeholders along the water supply and effluent pipeline routes in order to refine the route to best satisfy their requests and to improve environmental outcomes.

The route refinements that we have identified have led to the pipeline corridors deviating in five locations from the corridors shown in the Schedule 1 maps.

I have attached copies of relevant Schedule 1 maps (Attachment 1) showing both the existing corridors and the proposed refined corridors, with the deviations identified. I have also attached a table describing the proposed deviations and the reasons for them (Attachment 2).

Your Department has advised that because the deviations go outside the corridors shown on the Schedule 1 maps, the Schedule would need to be amended to allow you to approve the refined corridors, and hence the Environmental Impact Management Plan (EIMP) modules that relate to the corridors.

There have also been some minor changes to the pulp mill footprint relative to that shown in the Schedule 1 maps. For example, the shape of the wharf groynes has changed and we are now proposing to construct a gatehouse on the access road as part of the agreed roadkill management measures. Your Department has advised that these changes should also be provided for by replacing the pulp mill footprint map in Schedule 1 with an updated map.

.../2

The pipeline deviations have been subjected to ecological surveys by an expert approved by your Department. We submitted a survey report for Commonwealth listed flora species and detailed vegetation maps of the corridors, including the proposed deviations, to your Department in our draft pipeline construction Module F-G-H-K.

The changes to the pulp mill footprint have also been surveyed for Commonwealth listed flora species, and a survey report was included in the approved mill site vegetation clearing Module B.

Additional spring 2008 surveys will also be undertaken for *Caledonia caudata* in areas of the changes that have potentially suitable habitat that were not surveyed in 2007, as identified in the submitted species survey report.

On the basis of the surveys described in the Preliminary Documentation and the above supplementary surveys we consider that none of the deviations will cause any significant impacts on matters of National Environmental Significance.

The deviations have led to a reduction in the total area of native vegetation that will be cleared, down from the approximate 200 ha identified in the Preliminary Documentation to approximately 195 ha, thereby further reducing any potential environmental impact from the project.

I have provided a proposed new set of Schedule 1 maps in Attachment 3, which show the proposed refined corridor and footprint.

I request that you give consideration to vary the approval by replacing the existing Schedule 1 maps in the approval with the proposed new set of maps in Attachment 3.

If you agree to this variation, the new Schedule 1 maps will allow for the corridor adjustments necessary to satisfy landowner and other stakeholder needs, while in our view causing no significant impact on matters of National Environmental Significance and allowing a reduction in the amount of native vegetation that will be cleared.

We appreciate that the due administrative process for you to make such an amendment will take some time. We also appreciate that you will be unable to undertake your formal assessment of the applicable EIMP modules until that process is complete.

On another matter related to timing, as you are also aware Gunns has been preparing the EIMP as a series of sixteen modules. To date you have approved four of these and a further eleven have been submitted to your Department for review. We expect to submit the final module to your Department by the end of this week.

In our view, the diligent work done by Gunns, the Department and the IEG is ensuring that the EIMP is consistent with the requirements of the approval and best practice environmental management. I wish to express my appreciation to your Departmental officers and members of the IEG for the comprehensive reviews that they have undertaken of the modules.

The Gunns pulp mill will set new international best practice standards for environmental performance and we are committed to working with you to establish a world's best practice EIMP to deliver this outcome.

Drafts of complex modules relating to the ongoing operations and monitoring of the pulp mill have recently been submitted to your Department. We will continue to liaise with the Department over the coming weeks to enable the timing of the finalisation and assessment of the remaining modules to be clarified.

In summary, I would be grateful if you could give consideration to varying EPBC approval 2007/3385 by replacing the existing Schedule 1 maps in the approval with the new set of maps provided in Attachment 3 to this letter.

I would be happy to provide any further information that you may require.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C. Frame', with a long horizontal flourish extending to the right.

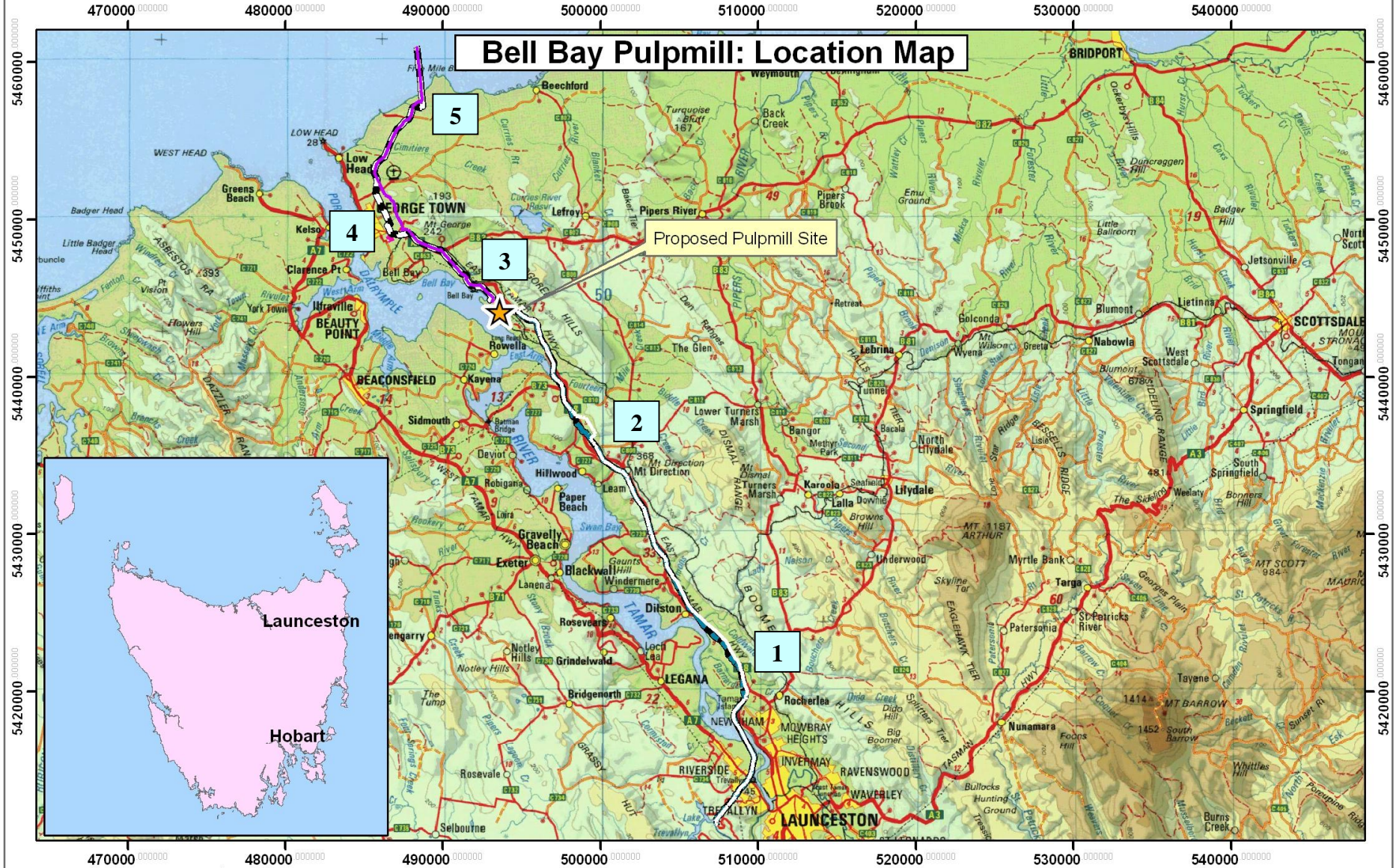
Calton Frame
Resource and Sustainability Manager

Attachment 1

Proposed changes overlaid onto existing Schedule 1 maps

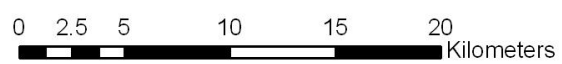
Proposed revised pipeline corridors (white for water pipeline, purple for effluent pipeline) overlaid onto an existing Schedule 1 map. The proposed deviations from the existing Schedule 1 corridor are identified by number – see Attachment 2 for reasons for the proposed deviations.

Bell Bay Pulpmill: Location Map

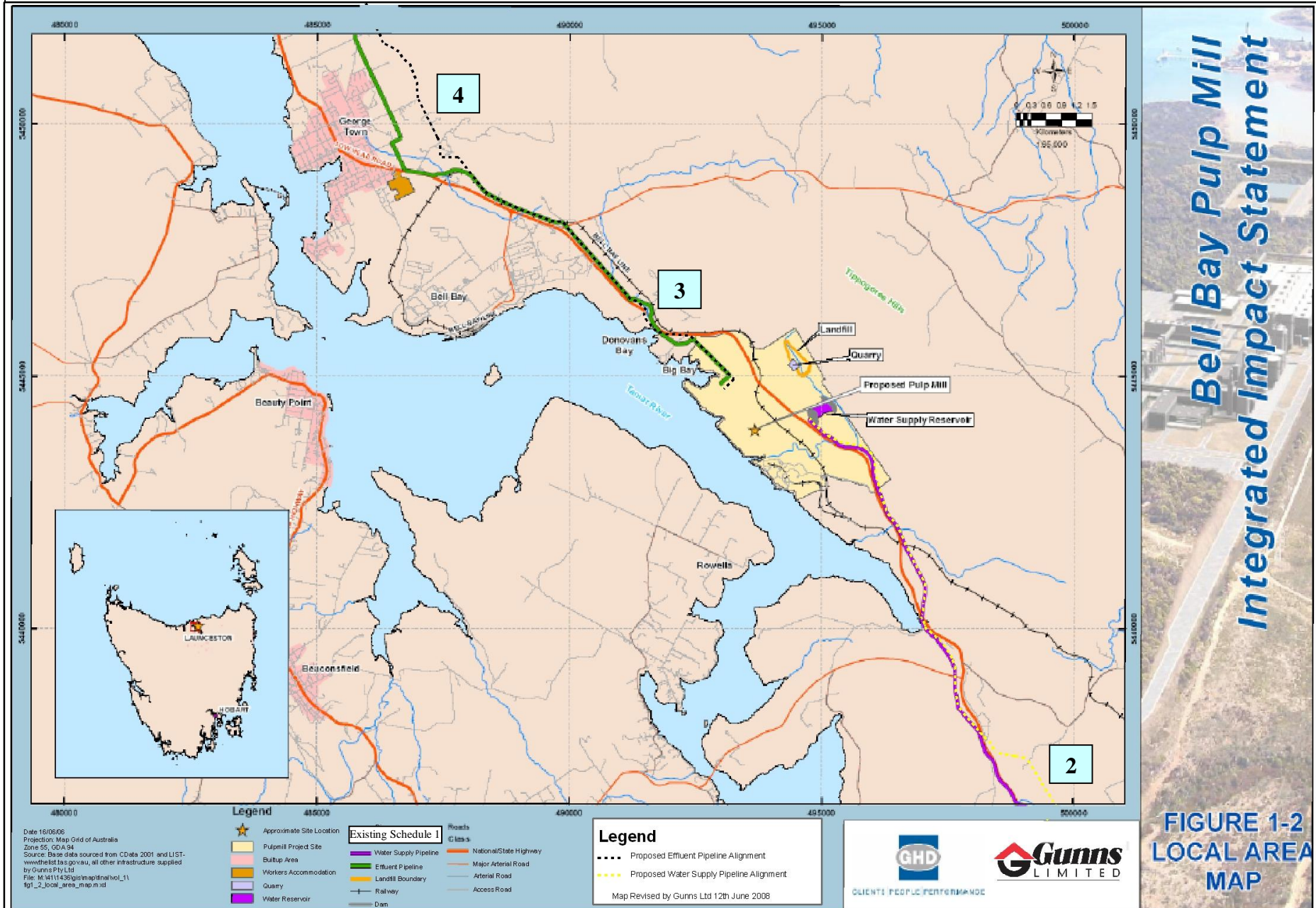


- Legend**
- Proposed Pulpmill Location
 - Proposed Water Supply Pipeline as per Preliminary Documentation for assessment under EPBC Act
 - Current Preferred Effluent Pipeline Alignment
 - Current Preferred Water Supply Pipeline Alignment
 - Proposed Effluent Pipeline as per Preliminary Documentation for assessment under EPBC Act

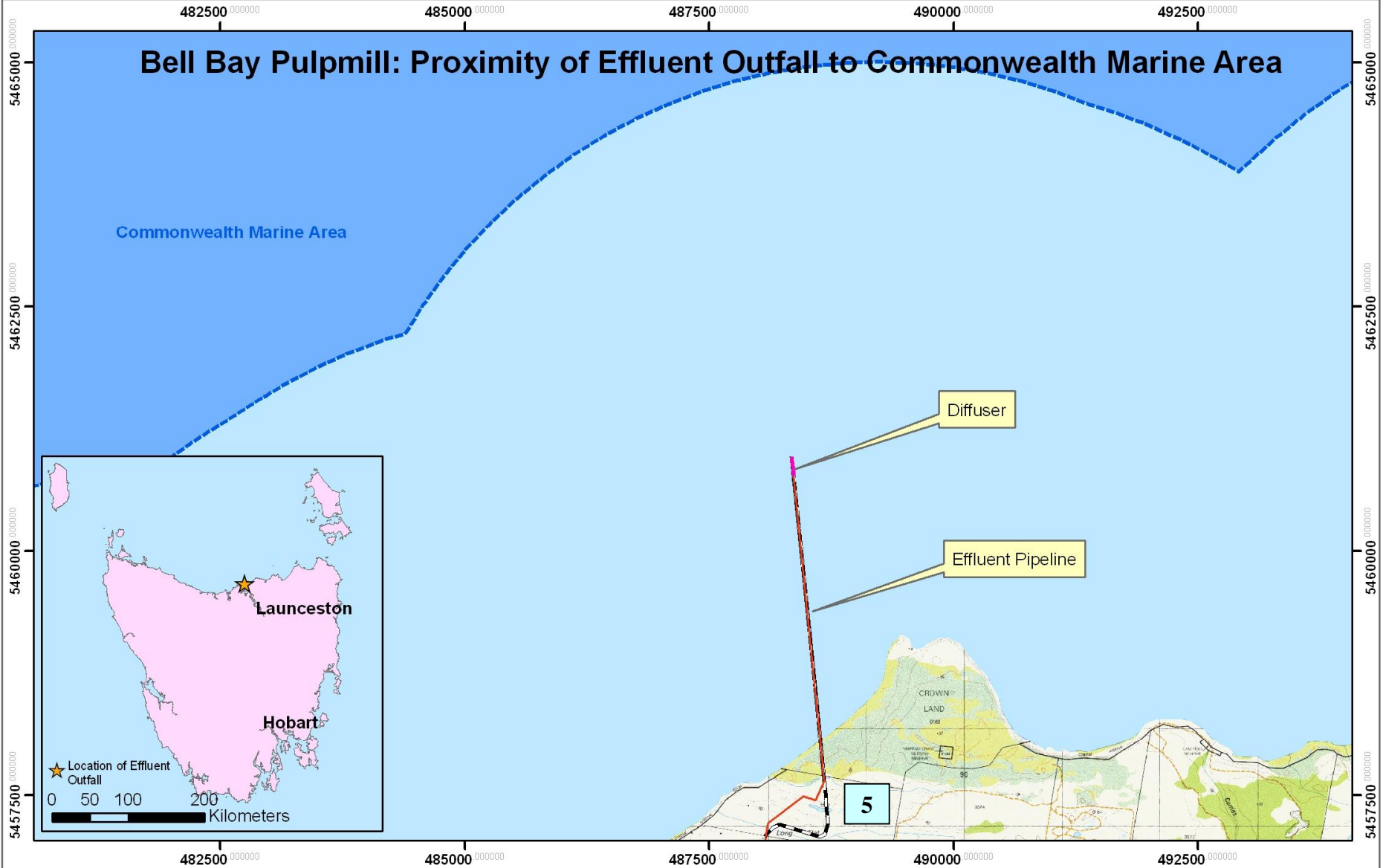
Coordinate System: MGA (GDA 94) zone 55
 Basemap supplied by the TASMAT
 Map Revised by Gunns Ltd 12th June 2008



Proposed revised pipeline corridors (yellow dotted for water pipeline, black dotted for effluent pipeline) overlaid onto an existing Schedule 1 map. The proposed deviations from the existing Schedule 1 corridor are identified by number – see Attachment 2 for reasons for the proposed deviations.



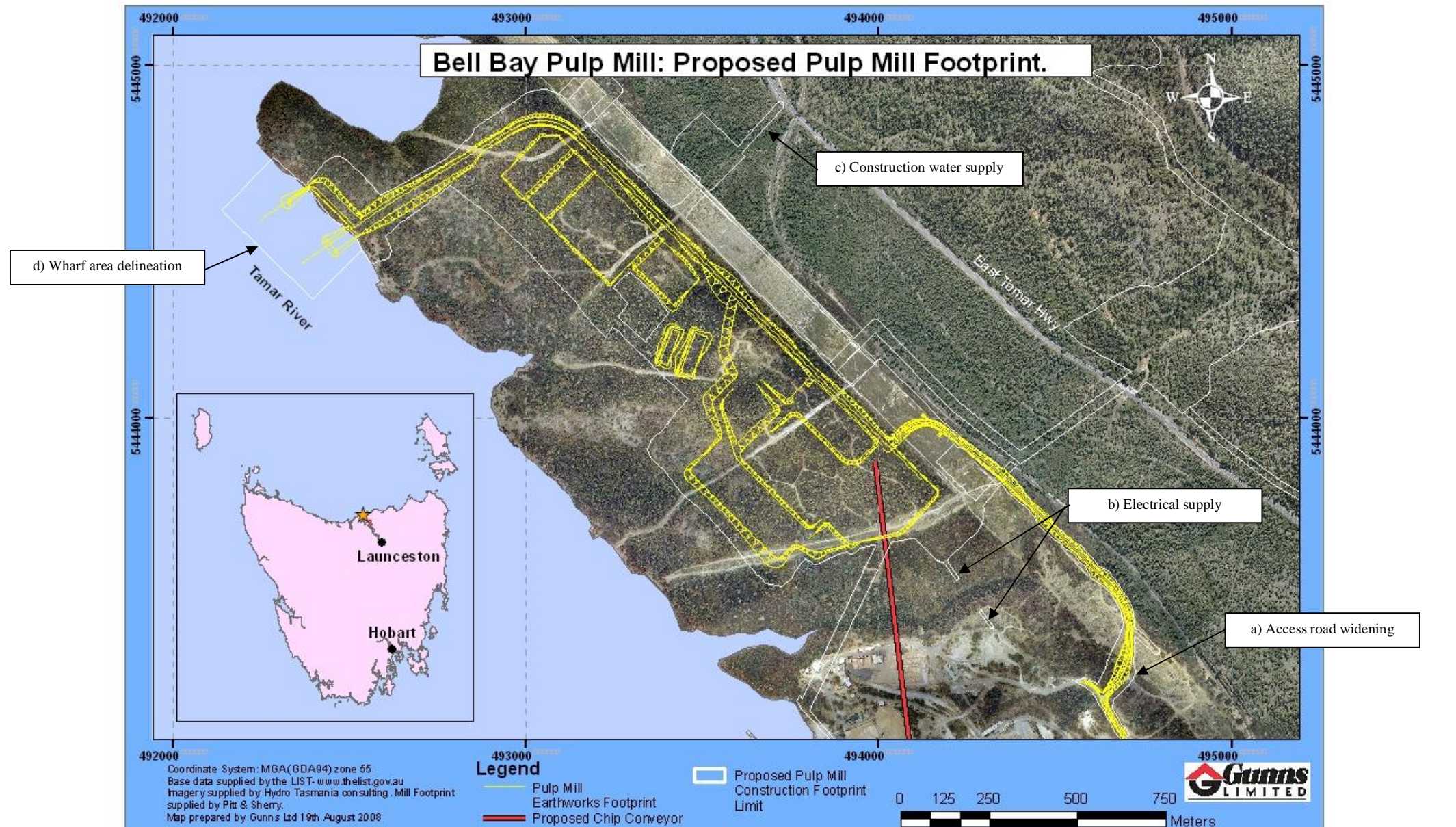
Proposed revised effluent pipeline corridor (red) overlaid onto an existing Schedule 1 map. The proposed deviation from the existing Schedule 1 corridor is identified by number – see Attachment 2 for reasons for the proposed deviation.



Coordinate System: MGA (GDA 94) zone 55
 Basemap supplied by the TASMAR
 Basedata supplied by the LIST-www.thelist.tas.gov.au
 Map Revised by Gunns Ltd 12th June 2008

- Legend**
- Coastal Marine Area
 - Bass Strait
 - Proposed Effluent Pipeline as per Preliminary Documentation for assessment under EPBC Act
 - Current Preferred Effluent Pipeline Alignment
 - Diffuser





Proposed project area construction footprint limit (white line) overlaid onto the bulk earthworks footprint (yellow) that is shown in the existing Schedule 1. Note that the corresponding map in Schedule 1 only shows the bulk earthworks footprint and not the project area footprint. The footprint limit shown above (white line) encompasses all elements of the project that are within the frame of this map (not just bulk earthworks). The footprint limit shown (white line) in this figure is consistent with the limits of the pulp mill impact footprint that were shown in Attachment 3 of the Preliminary Documentation and also in the approved EIMP modules apart from at the locations annotated on the figure: a) A widening of a section of the access road for the relocation of a Telstra cable and a water supply pipe to the chip mill and the siting of a vehicle washdown bay; b) The provision of a new electrical supply; c) The provision of a new construction water supply; and d) The rectangular delineation of the wharf area to encompass the whole wharf not just the groynes (note that the shape of the groynes themselves has changed from that shown in this figure also). The area of native vegetation impacted by these changes is included in the revised ~195 ha overall area of native vegetation that will be cleared, a reduction from the ~200 ha expected in the Preliminary Documentation.

Attachment 2

Descriptions of proposed changes to pipeline corridors

(Numbering identifies deviations shown on the maps in Attachment 1)

Name	Reason for new alignment
1. Dilston Bypass	Subsequent to the approval the new State and Commonwealth funded Dilston bypass project has commenced. The Dilston Bypass will create an additional linear corridor across private land. At the request of landowners, the pipeline corridor has therefore been adjusted to run adjacent to the bypass corridor, effectively consolidating the two corridors into one to reduce impacts on landowners.
2. Egg Island Creek	Westwood Holdings have not agreed to the pipeline corridor running through their land in the vicinity of the landowner's residence. The corridor adjustment deviates around this property on a property owned by Gunns.
3. Bell Bay power station	Subsequent to the approval the Alinta power station has been constructed over the route alignment. The proposed corridor deviates around the power station. The deviation creates additional constraints due to a pinch point of multiple services that must be avoided.
4. George Town	<p>After earlier agreement with the George Town Council on the original pipeline corridor through George Town, Council now require the corridor to follow a new alignment further to the east of the town so as not to impede town development.</p> <p>Of all the deviations, this is the only one for which two options need to be provided for. George Town Council has nominated the deviation as its preferred route. This option is being negotiated with the landowners and Council is assisting with these negotiations.</p>
5. Shore crossing	<p>In the original corridor, the Basslink high voltage cable was to be crossed by tunnelling under it. With the tunnelling method, the pipeline stringing operation would have been conducted from a combined weight coating and pipe stringing yard inland of that dune. The pipeline would have been pulled through the tunnel as it was towed out to sea.</p> <p>Subsequent to the approval the owners Basslink require an above ground-crossing of Basslink. The sharp change in vertical alignment prevents the achievement of a straight line pipeline pull from inland of the dune, which means that the stringing yard now needs to be seaward of Basslink.</p> <p>This relocation of the stringing yard separates it from the weight coating yard, which can now be relocated to a more convenient area, adjacent to Aerodrome Road. The change also allows the pipeline alignment from the stringing yard to the relocated weight coating yard to be modified to achieve a lower environmental impact.</p> <p>The net result of these changes is a proposed new construction corridor.</p>

Attachment 3

Proposed maps to replace existing Schedule 1 maps

Bell Bay Pulp Mill: Location Map






Workers Accomodation Facility

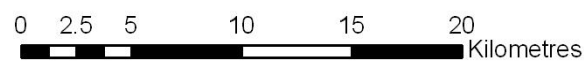
Effluent Pipeline

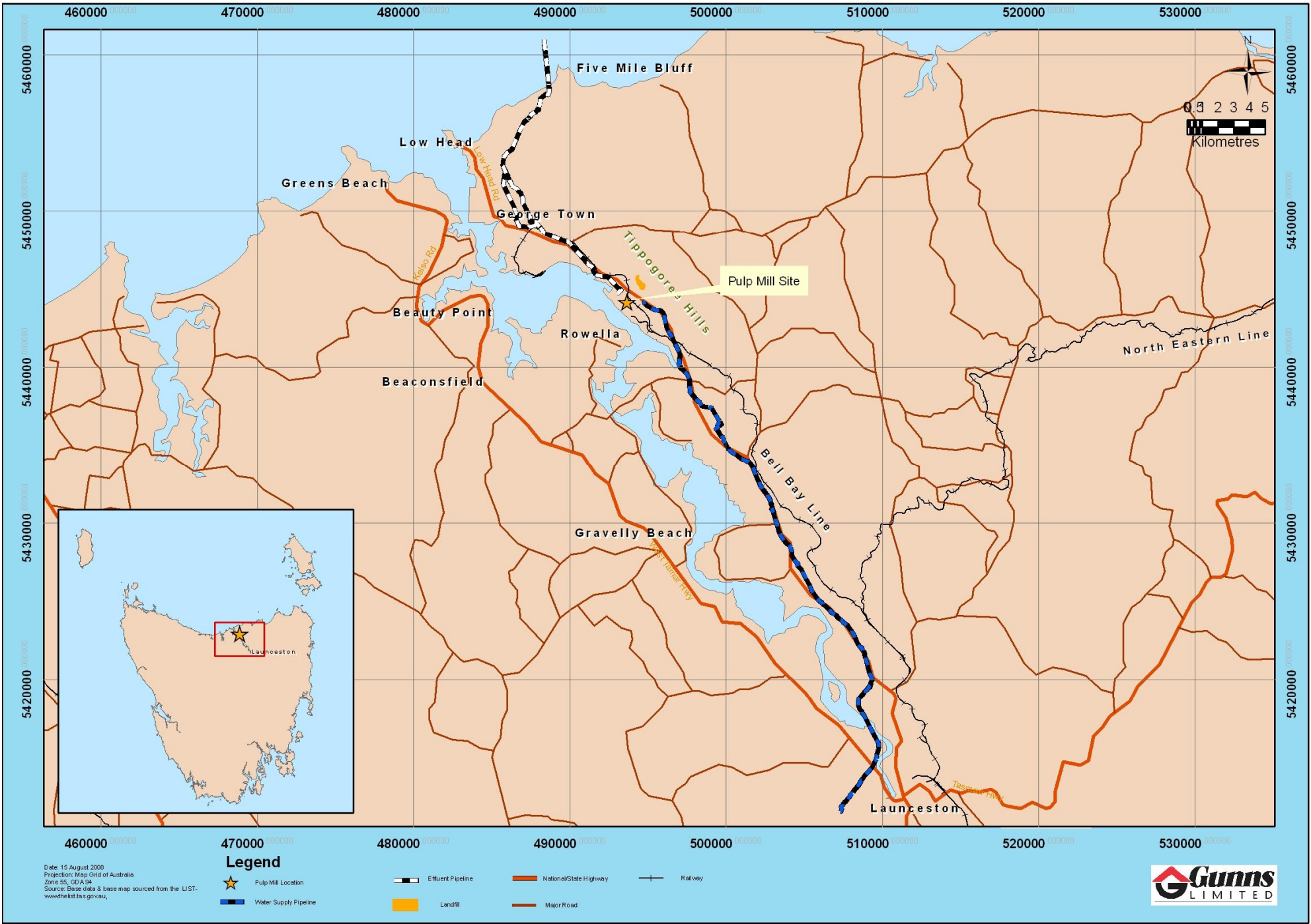
Pulp Mill Site

Water Supply Pipeline

- Legend**
-  Pulp Mill Location
 -  Water Supply Pipeline
 -  Effluent Pipeline

Coordinate System: MGA (GDA 94) zone 55
 Basemap supplied by TASMAP
 Base data supplied by the LIST
 www.thelist.tas.gov.au
 Map prepared by Gunns Ltd 19th August 2008



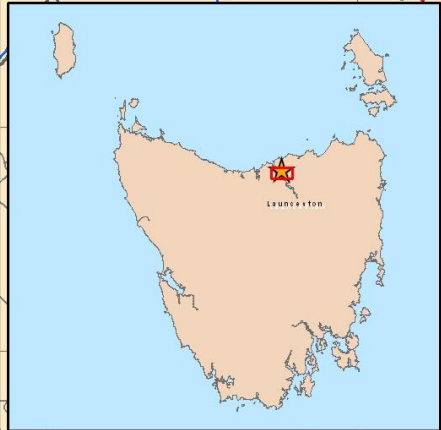


Date: 15 August 2008
 Projection: Map Grid of Australia
 Zone 55, CGA 34
 Source: Base data & base map sourced from the LIST-
 www.thelist.tas.gov.au

Legend

- ★ Pulp Mill Location
- Effluent Pipeline
- National/State Highway
- Railway
- Water Supply Pipeline
- Landfill
- Major Road





Projection: MGA (GDA 94) Zone 55
 Source: Base data sourced from UST,
 www.the-list.tas.gov.au, all other infrastructure supplied
 by Gunns Pty Ltd
 Map prepared by Gunns Ltd 19th August 2008

Legend

- ★ Pulp Mill Location
- Pulp Mill Project Site
- Workers Accommodation Facility
- Quarry
- Water Reservoir
- Rivers
- Water Supply Pipeline
- Effluent Pipeline
- Landfill
- +— Railway
- National/State Highway
- Major Arterial Road
- Arterial Road
- Access Road
- Pulp mill site construction footprint



Bell Bay Pulp Mill: Proximity of Effluent Outfall to Commonwealth Marine Area

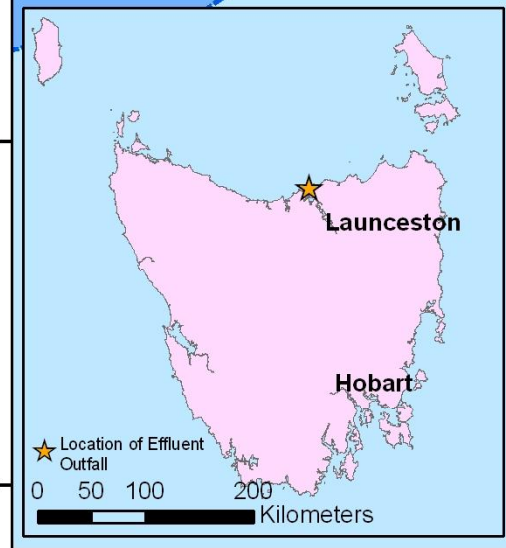
Commonwealth Marine Area

Diffuser

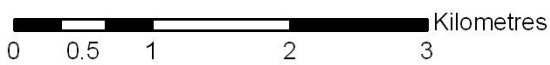
Outfall Pipeline

Legend

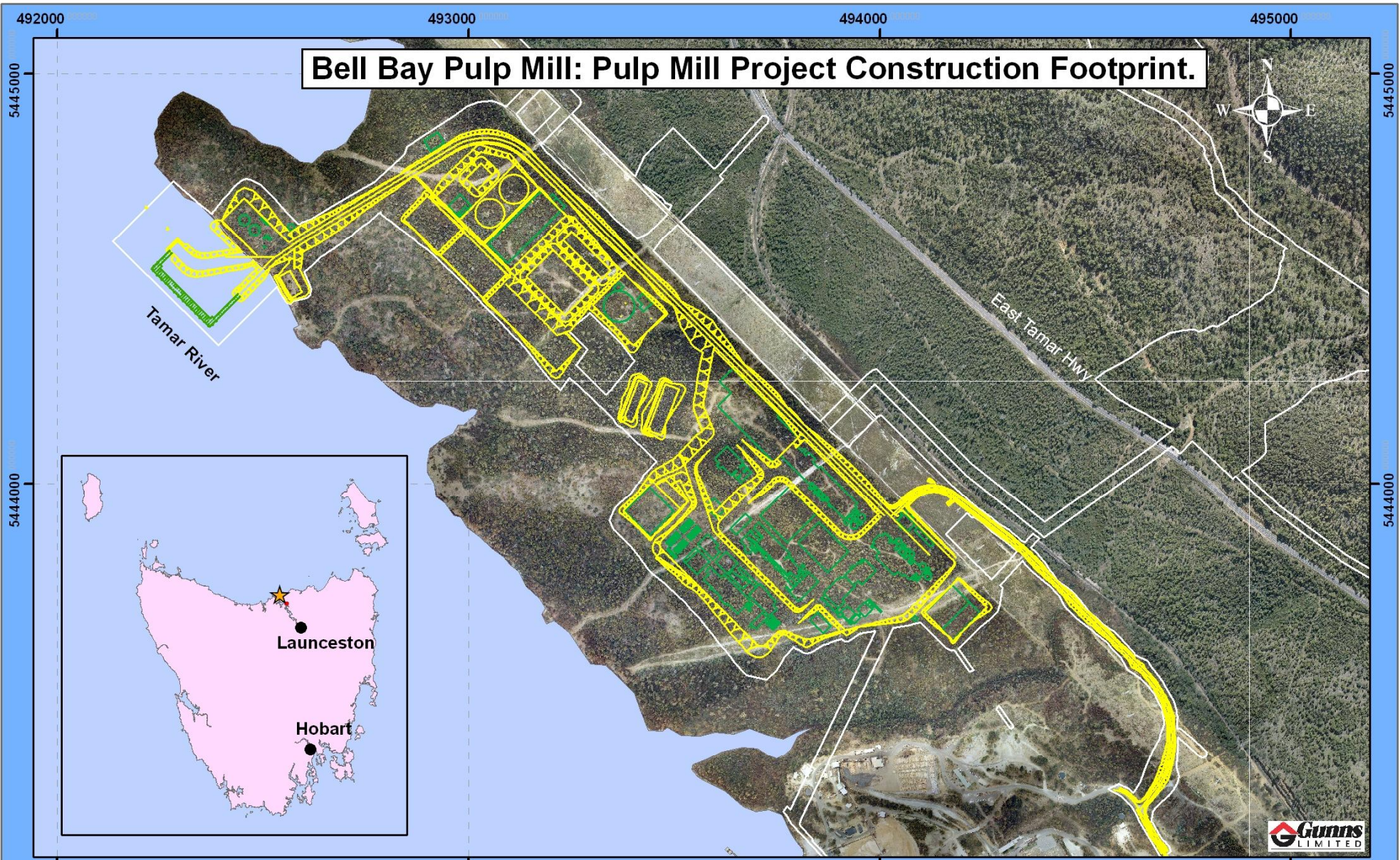
-  Commonwealth Marine Area
-  Bass Strait
-  Effluent Pipeline
-  Diffuser
-  Outfall construction work area



Coordinate System: MGA (GDA 94) zone 55
 Basemap supplied by the TASMAR
 Basedata supplied by the LUST-www.thelst.tas.gov.au
 Map prepared by Gunns Ltd 19th August 2008



Bell Bay Pulp Mill: Pulp Mill Project Construction Footprint.



Coordinate System: MGA (GDA 94) zone 55
 Base data supplied by the LIST- www.thelist.gov.au
 Imagery supplied by Hydro Tasmania consulting. Mill Footprint supplied by Pitt & Sherry
 Map prepared by Gunns Ltd 19th August 2008

Legend

- Pulp Mill Structure Layout - indicative only and subject to change
- Pulp Mill project construction footprint limit
- Pulp Mill Earthworks Footprint- indicative only and subject to change

