4 June 2007

To: See distribution list

Assessment of Gunn's Proposed Pulp Mill

We are a group of concerned residents of the Tamar Valley and we want to register our strong objection to the proposed Gunn's Limited pulp mill. We would also like to register our disgust in the manner that this proposal has been managed by both the Tasmanian State Government and the Federal environment minister. They have allowed this pulp mill proposal to undergo a much less rigorous assessment by avoiding the truly independent review and approval process previously offered by the RPDC.

Many of the members of our group are practising professional engineers working in the maritime industry. Some of these members have contributed towards a submission to the EPBC raising issues such as; the hydrodynamic modelling and the marine impact assessments, decommissioning of the mill, the effluent pipeline shore crossing and the destruction of Tasmania's forests. We have summarised below one of these issues raised to provide you with a sample of our legitimate concerns:

Hydrodynamic modelling and the marine impact assessments

The *Final Scope Guidelines* clearly state that normal operating conditions **and** periods when pollution control equipment may fail or be shut-down for periods must be considered when assessing the impact of the effluent on the marine environment. After studying many of the publicly available documents it appears that (at least) the hydrodynamic modelling and the marine impact assessments completed to date **do not meet this guideline**. For example:

- Only one case has been investigated, which is assumed to represent "normal operating conditions" (although this is not clearly stated);
- No attempt has been made to model a worst case scenario;
- Details provided by Jaakko Poyry (JP) indicate that there are vast differences between the case modelled and the so called worst case. For example, the total volume of effluent pumped into Bass Strait is stated as being somewhere within the extremely broad range of 50,000 to 94,500 tonnes per day (t/d). The only case that has actually been modelled considers a flow of just 63,770 t/d, which is well below the average of this range;
- The concentrations for each of the components of this effluent are also provided by JP (eg AOX, chlorate, dioxins etc) and many of these concentrations also vary over a wide range. For most of the components a very low "average" value within the range has been adopted;
- All values supplied by JP are their "estimates" and it appears that no factor of safety has been applied to allow for any underestimations;
- No attempt has been made to have the data supplied by JP validated as being realistic by an independent party, making the application of a factor of safety even more important;
- No allowance has been made for any possible increases in effluent flow, over and above the suggested maximum of 94,500 tonnes per day. For example, it has recently become publicly known that this pulp mill may consume considerably more fresh water than originally stated (from 26,000 up to 40,000 megalitres per annum). What effect will this have on the volume of effluent pumped into Bass Strait?

In summary, the guidelines clearly state that some form of worst case scenario must be considered. The single case that appears to have been modelled only considers a total volume of effluent spewed into Bass Strait of 63,700 t/d which is substantially lower than the suggested maximum of 94,500 t/d. This represents an expected increase in effluent volume of approximately 50% over that actually modelled. As a result, the realism of all predictions from the hydrodynamic modelling may be significantly diminished.

This could significantly affect the findings from all other studies that are based upon the results from the hydrodynamic modelling – which includes the studies into environmental and health impacts, such as the Marine Impact Assessments and Human Health Risk Assessments conducted by Toxikos. Both of these studies have recently been questioned by a Professor of Petroleum Technology at Curtin University of Technology who claims that the consultant has made a fundamental error in its calculation of dioxin levels and their associated risks. The professor says dioxin levels quoted in the Human Health Risk Assessment are almost 1,400 times lower than they should be - how much worse could these findings be if the worst case effluent flow had been investigated? How can any fair and objective assessment be made without considering a worst case scenario?

The grossly inadequate assessment processes put in place by both the Tasmanian State Government and the Federal environment minister will most likely not take into account the serious deficiencies briefly outlined above. Particularly as they appear driven by a commercial timeframe demanded by Gunns.

Finally, we have all read Richard Flanagan's very enlightening essay "*Gunns: Out Of Control – The Tragedy of Tasmania's Forests*" which was recently published in The Monthly (May 2007). If you have not read this article then we would recommend that you do. We can also assure you that the facts contained within this article are becoming increasingly more widely known, not just here in Tasmania, but around Australia and internationally. We all fully support one of Mr Flanagan's concluding statements where he suggests that "… nothing less than a major investigation with special powers can now clear away the stench that surrounds the corrupt nature of the Tasmanian forestry industry."

You have the responsibility and opportunity to ensure that a truly independent and thorough review and approval process is undertaken.

Yours sincerely,

Jonathan Duffy (BEng) .....
Sarah Duffy (DipFLM) .....
Cheryl Honeychurch .....
Drew Honeychurch (DipTeach) .....
Kym Honeychurch .....
Liam Honeychurch .....
Tim Lilienthal (BEng, BSc) .....
Gregor Macfarlane (BEng, MPhil) .....
Leanne Macfarlane (BEd, MSpecEd) .....
Giles Thomas (BEng, MEng, PhD) .....
Alastair Waterhouse (BEd) .....
Jaide Waterhouse (BEd) .....
Patrick Wilson (BComp) .....
Emily Ross (BSc) .....
Gypsy Fox (DipHort) .....
Jon Schreffler (Dip Aqua) .....
Richard Young (BEng) .....

Address for correspondence: Concerned citizens
22 Acropolis Drive
Legana, TAS, 7277

Distribution list:

The Hon. Malcolm Turnbull, Minister for Water and Environment
malcolm.turnbull.MP@aph.gov.au

Tasmanian Federal Members of Parliament

Liberal Party
Senator The Hon. Eric Abetz senator.abetz@aph.gov.au
Senator Guy Barnett senator.barnett@aph.gov.au
Senator The Hon. Paul Calvert senator.calvert@aph.gov.au
Senator John Watson senator.watson@aph.gov.au
Senator The Hon. Richard Colbeck senator.colbeck@aph.gov.au
Senator Stephen Parry senator.parry@aph.gov.au

Labor Party
Senator Carol Brown senator.carol.brown@aph.gov.au
Senator Kerry O'Brien senator.obrien@aph.gov.au
Senator Helen Polley senator.polley@aph.gov.au
Senator The Hon. Nick Sherry senator.sherry@aph.gov.au

Greens
Senator Bob Brown phone 03 6234 1633 Postal Address GPO Box 404, Hobart TASMANIA 7001
Senator Christine Milne senator.milne@aph.gov.au

House of Representatives, Canberra

Labor Party
The Hon Dick Adams D.Adams.MP@aph.gov.au
The Hon Duncan Kerr Duncan.Kerr.MP@aph.gov.au
Mr Harry Quick Harry.Quick.MP@aph.gov.au

Liberal Party
Mr Mark Baker Mark.Baker.MP@aph.gov.au
Mr Michael Ferguson Michael.Ferguson.MP@aph.gov.au

Tasmanian Members of the Legislative Council

Michael Aird MLC michael.aird@parliament.tas.gov.au
Kerry Finch MLC kerry.finch@parliament.tas.gov.au
Ivan Dean MLC ivan.dean@parliament.tas.gov.au
Ruth Forrest MLC ruth.forrest@parliament.tas.gov.au
Greg Hall MLC greg.hall@parliament.tas.gov.au
Paul Harriss MLC paul.harriss@parliament.tas.gov.au
Norma Jamieson MLC norma.jamieson@parliament.tas.gov.au
Terry Martin MLC terry.martin@parliament.tas.gov.au
Doug Parkinson MLC doug.parkinson@parliament.tas.gov.au
Tania Rattray-Wagner MLC tania.rattray-wagner@parliament.tas.gov.au
Sue Smith MLC sue.smith@parliament.tas.gov.au
Allison Ritchie MLC allison.ritchie@parliament.tas.gov.au
Lin Thorp MLC lin.thorp@parliament.tas.gov.au
Jim Wilkinson MLC jim.wilkinson@parliament.tas.gov.au
Don Wing MLC don.wing@parliament.tas.gov.au