

Timber Optimisation Hub, Development Application (10-2020-81-1)

Submission from South East Region Conservation Alliance (SERCA) Inc, PO Box 797, Bega NSW 2550

The South East Region Conservation Alliance (SERCA) Inc, is the principal umbrella organisation for environment groups on the NSW South Coast. It was formed in September 2005 and incorporated on 2nd June 2008 (INC9889501). Its membership includes 14 individual groups in the Bega Valley and Eurobodalla Shires.

The area corresponds closely to the area in which the impacts of this development, if approved, will be most strongly felt.

This application has been lodged at a time of the Covid-19 emergency, when the attention of the community has been diverted by issues related to the emergency. Native forest logging and woodchipping is a highly divisive issue for decades within the Bega Valley and neighbouring shires and for that reason alone this DA warrants the greatest possible public scrutiny. It should not be approved at a time when the community is preoccupied by the health emergency.

1. Scope of the Development Application

The proponents have applied a very narrow and unrealistic focus in identifying and assessing impacts of the development. Its consequences will extend far beyond the boundaries of Lot 16 DP 1066187. Indeed they will extend as far north as Shoalhaven, west to the Snowy Monaro shires and south to the State of Victoria.

These impacts are immense and overwhelmingly negative. The consequences for soil erosion, native forests, wildlife, and CO2 emissions should all have been assessed and considered, but were not.

For some matters such as air quality, noise impacts, water resources and quality (to a limited extent) and motor vehicle traffic impacts beyond the chipmill site were assessed, albeit, inadequately over a wider area. But no effort has been made to assess impacts on forests, wildlife, water resources within the supply zone.

2. ANWE will be the monopoly buyer for every log produced in the Eden Region if this DA is approved

If Allied Natural Wood Exports (ANWE) gets this project approved, it gets sole contractual entitlement to every single tree cut down from State Forests in the region. Indeed, it is a condition of the new Eden Wood Supply Agreement, commencing 1 January 2020, between ANWE and the Forestry Corporation that it meets certain milestones in building this new facility.

https://www.forestrycorporation.com.au/_data/assets/pdf_file/0006/1214637/allied-natural-wood-exports-pty-ltd-hardwood-forests-sawlogs.PDF

3. Uncertainty about cost

There is conflicting information about the cost of the project. In a BVSC video¹ interview, promoting the project on 22 April 2020, the project was described as having a value of \$45 million. However, in

¹ Bega Valley Shire Council Facebook page, 22 April 2020 <https://www.facebook.com/begavalleyshirecouncil/>

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the DA documents the development cost stated is \$14.5 million, with the cost of the colorbond buildings given as just \$1,836,586.

Malcolm McComb (ANWE owner/manager) on ABC SE Regional News 7.30am 11 May 2020 gave the cost as \$17 million.

So, we have had 3 different costs: \$45M from Ian Campbell in BVSC video, \$14.5m in the DA itself and \$17M from Malcolm McComb.

The promotional video leaves the impression that BVSC resources may have been misused to boost the development, which could indicate a conflict of interest, or that the applicant has understated the cost in order to minimise fees. These matters need clarification.

The briquette plant has been awarded \$3 million from NSW taxpayers. This was announced by Minister for Regional NSW John Barilaro in December 2019. ²

4. Entrenches intensive native forest logging and stops a transition to plantations for the woodchipping industry

The Wood Supply Agreement, which requires the approval of this DA, will lock in the use of native forest wood for at least another decade, with 5 yearly extensions after that.

The project seeking approval would provide the means for the woodchipping industry to tighten its grip on the forests of the entire South Coast and East Gippsland. The development will make this one of the biggest native forest sawmills in Australia, processing 60,000 m³/a. Ninety six percent of hardwood sawmills in Australia³ are less than 45000 m³ a year throughput.

This would be in addition to approximately 600,000 tonnes of woodchips typically exported each year.

Low value new products such as briquettes and pallets do not add value to the region's forests any more than woodchipping does.

² <https://www.dpi.nsw.gov.au/about-us/media-centre/releases/2019/successful-forest-innovation-project-unveiled>

³ [ABARES 2019](#)

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Discarded pallets at the Eden Recycling/Waste Depot

5. Water quality and quantity impacts have been ignored

Intensive logging required to supply this mill has been responsible for serious reduction in water quality and availability for important local industries such as oyster growing and agriculture.

Coastal estuaries and lakes can be harmed by logging upstream and oyster growers have been active over many years in attempts to stop or limit logging in catchments such as Wonboyn.

6. Soil erosion

Top soils are often lost when logging occurs in catchments, damaging the agricultural productivity of farming land and the regrowth forest. ⁴ According to the World Wildlife Fund: "Without trees to anchor fertile soil, erosion can occur and sweep soil into rivers, choking and polluting our waterways. Estimates suggest that one-third of the world's arable land has been lost through soil erosion and degradation since 1960."

7. Ignores bushfire impacts

The applicant, especially in the report "Biodiversity and EPBC Act Protected Matters Report" ignores the impacts of the recent summer bushfires on forests intended to supply the mill. That report was written before the fires, and no meaningful changes were made afterwards to reflect the damage done and the new circumstances.

In the summer bushfires, 80 percent of the forest available for logging was burnt. An estimated one billion animals were killed. The forests of the region were already overlogged and there are serious doubts about whether the forests can supply enough resource to make the industry viable. Establishing this facility will increase pressure on the forests at a time when they need time to recover.

⁴ <https://www.wwf.org.au/what-we-do/species/tree-clearing#gs.5o6h0n>

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Further, there is growing scientific evidence⁵ that intensive industrial logging of native forests increases fire risk and makes fires harder to control. The Border Fire, which in January 2020 travelled from the Victorian border to Eden in a single day is a good example of this. It burnt through some of the most intensively logged forest in Australia having been subjected to decades of logging for the woodchipping industry.

8. Climate issues have been ignored

The Bega Valley Shire has declared a climate emergency and has a Climate Resilience Strategy. This DA makes just two trivial references to climate, one of them dismissing it as a matter which need not be considered, because the project is not residential. This raises ethical and possibly legal issues around approval of the DA.

9. Approving the DA will slash direct job numbers in sawmilling from 55 to 20

In 2019 Blue Ridge Hardwoods, with 55 employees lost the Eden sawlog Wood Supply Agreement to ANWE and is now in the process of closing. The new ANWE facility will employ 20, according to the DA. This project will thus be the direct cause of Eden sawmilling jobs falling by more than 60 percent.

10. Previous matters before Council

The Statement of Environmental Effects 2.2 lists previous Development Approvals granted by Bega Valley Shire Council under NSW Planning Legislation.

This list overlooks reference to the 2 metre tall, high voltage electrified fence that was built in 2002 to keep protesters out. The fence was retrospectively legitimised after complaints.

11. Conclusion

There are many compelling reasons to reject the DA. Bega Valley Shire Council will be acting in the longer term interests of residents, ratepayers, their economy and environment if it rejects it. This submission provides a brief summary of key issues only and we are happy to elaborate on all or any other them if Councillors wish.

⁵ <https://www.theguardian.com/environment/2020/may/06/compelling-evidence-logging-native-forests-has-worsened-australian-bushfires-scientists-warn>