

Harriett Swift
PO Box 915
Bega NSW 2550
22 February 2012

The General Manager
Bega Valley Shire Council
Zingel Place
Bega NSW 2550

Attention: Mr Rob Slapp

**DA 2012.0020 MT DARRAGH ROAD, PAMBULA Lot 6 DP 62375 Parcels
13266, 36549**

I wish to lodge an objection to this development for the following reasons:

- The enterprise has not just been operating without Development Approval from the Bega Valley Shire Council, it may have been operating outside the legal framework controlling native forest logging in this region. In the public interest, Council should require a lot more information about the legal basis for Forests NSW engaging in the supply of “miscellaneous grade timber” destined for firewood before it approves this operation.
There are detailed legal requirements governing the extraction of wood from both public and private forests. There is no indication of whether these legal requirements have been complied with.
- The stated figure for the annual throughput of 5,000 tonnes requires clarification. The current stockpile of processed firewood on site is substantial and must be close to that figure. How is the throughput to be monitored and by whom? What is the quantity of wood on site now? What quantity of wood is Forests NSW contracted to supply?
I submit that there is a strong likelihood that the project will exceed the stated 5,000 tonnes and should be treated as a “designated development” and require an Environmental Impact Statement.
- This is a highly seasonal industry and figures on noise and truck numbers should reflect that. Currently they do not appear to.
- Sustainability is a requirement of all developments within the shire. In this regard, I propose that answers to the following questions should be obtained from Forests NSW before the Development Application is further considered:
 1. How much timber processed at the firewood processing operation in Mt Darragh Road, Pambula is sourced from State Forests?
 2. What royalties are paid for the timber; who is responsible for selecting which trees are to become firewood and what criteria are applied in selecting trees or logs as firewood?

3. What species of timber are supplied as firewood; do these include forest red gum, woollybutt, bloodwood, ironbark or mountain grey gum?
4. When did this timber supply to this enterprise commence; how much has been supplied to date; how much will be supplied per year?
5. What contractual or other supply arrangements exist between Forests NSW and the operator of this establishment?
6. Is South East Fibre Exports involved in supply contracts in any way?
7. Are logging contractors engaged by Forests NSW or South East Fibre Exports for the supply of this timber?
8. Is timber destined for this establishment identified in Harvest Plans? If not, why not?
9. Under what legal instruments is firewood sourced from State Forests?
10. Has any timber contracted for supply to South East Fibre Exports been diverted to this establishment?
11. Did Forests NSW continue to supply timber to this establishment after being advised by the Bega Valley Shire Council that the operation was functioning without planning approval?

Yours sincerely

Harriett Swift
21 February 2012