

## Eden woodchip mill pellet plant

Bega Valley Shire Council DA2011.35 Lot 16 DP 1066187.

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Harriett Swift 24<sup>th</sup> May 2011

According to information in the chipmill's own DA<sup>1</sup>, SEFE must have placed its order for this pellet plant last year, probably September or October. It lodged its DA on 1 February. It arrived on the wharf in Eden almost a month ago; now you are being asked to approve it. Confidence or what? Had not conservationists discovered that SEFE was proposing to do this, it might never have lodged a DA. Of course, it's not the first time they have done this. They did exactly the same thing with their electric security fence, which was fully constructed before they applied to legitimize it. And incidentally, they understated the value of that fence and thus minimized the fees payable by waiting until afterwards to add the 30cm concrete footing to the fence.

The only thing "green" about this development application was the colour of the shed, but even that now seems to be missing from the draft approval. Council is being asked to approve a project about which we've been told very little, but what we do know is very disturbing.

We know nothing about the noise it will make; nothing about the particulate or gaseous emissions it will generate; nothing about the cost and most importantly, nothing about what the chipmill really intends to do, longer term.

They have bought it from China, obviously from a manufacturer who knows or cares little or nothing about its impact on the environment. You might get away with that in China, but you shouldn't get away with it here.

I can't believe that this plant the first of its kind in the world. Why can't we get noise and emissions data from another plant already operating, even if the manufacturer is unwilling or unable to tell us?

When the DA was placed on public exhibition, no information whatsoever about direct or indirect emissions and their human health impacts was provided. We were simply assured: she'll be right.

By the time we have some information on emissions, the public will not get the chance to comment on them. In the interests of public health and transparency, the Council should have required this information and provided a further exhibition period before approval.

It is simply not good enough to say: OK, you can build it and we'll sort out those things later on when it's operating.

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<sup>1</sup> According to the DA (1.3.2 Timeframe for Development) "The plant can be built, delivered, installed and commissioned within seven months of an order being placed with the supplier." The plant arrived on the Eden wharf in the first week of May, which presumably means it was ordered last October or November, long before SEFE had lodged a DA to the council.

The very term “pilot” rings alarm bells. It tells us that SEFE does not intend to stop here, just as it did not stop at 5,000 tonnes of woodchips and now exports a million tonnes each year.

SEFE is using this proposal to develop and test a market in wood pellets. What kind of environmental standards, if any, will its customers demand? How burdensome will government regulations, if any, be? How much profit can it make? Will it maybe even get away with calling it renewable energy? Might it attract a subsidy if it does?

Rules controlling the processing and export of pellets are even less exacting than those governing the burning of native forest wood for electricity generation. If the pellets are exported, there are virtually no constraints on how they are made and sold, and I believe that this is what SEFE ultimately aims to do – selling them for industrial use in Japan.

But if SEFE plans to sell the pellets domestically as “renewable” energy, with the subsidies that this attracts, it is going to run into the same difficulties as the wood fired power station, but they probably figure they can extract a higher price from domestic use than from industry. Regardless of the “renewable” issue, it will also have to convince enough householders to install the special pellet heaters to burn this fuel, locking them into using it for years ahead.

Don't be fooled by the reference that bans “native forest bio-material” in the Protection of the Environment Operations (General) Regulation 2009 - Reg 96<sup>2</sup>.

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## **<sup>2</sup> PROTECTION OF THE ENVIRONMENT OPERATIONS (GENERAL) REGULATION 2009 - REG 96**

### **Definitions**

#### **96 Definitions**

In this Part:

"Australian native tree" means any tree of a species indigenous to Australia.

"electricity generating work" means a work (including associated facilities) that supplies, or is capable of supplying, more than 200 kilowatts of electricity.

"native forest bio-material" means the bio-material comprised in Australian native trees, other than:

(a) bio-material obtained from:

(i) an authorised plantation within the meaning of the [Plantations and Reafforestation Act 1999](#), or

(ii) an existing plantation within the meaning of [section 9](#) of that Act, or

(iii) land on which exempt farm forestry (within the meaning of that Act) is being carried out, or

(iv) land on which ancillary plantation operations (within the meaning of [section 9](#) of that Act) are being carried out, or

(b) sawdust or other sawmill waste, or

(c) waste arising from wood processing or the manufacture of wooden products, other than waste arising from activities (such as woodchipping or the manufacture of railway sleepers) carried out at the location from which the Australian native trees are harvested.

. All that means is that they can't do something which is already illegal anyway and something they don't want to do anyway because it would be too expensive. Just yesterday, the Climate Commission released its report - The Critical Decade:

<http://climatecommission.govspace.gov.au/files/2011/05/4108-CC-Science-Update-PRINT-CHANGES.pdf>

It calls for an end to the logging of native forest. At a time when Australia is finally waking up to the importance of our native forests in combating climate change, it would be a very sad day for the Bega Valley to be leading the charge in the other direction, giving the green light to yet another pretext for destroying the forests and turning them into carbon dioxide.

I ask councillors to reject this application