

DA 10 - 2020 - 81 - 1 "Timber Optimisation Hub"

It is my submission on the advertised DA for the "3 Colorbond sheds" at the ANWE woodchip mill south of Eden that the DA should be rejected.

There are numerous good reasons to reject the application and I will be focussing mainly on the environmental consequences of the intensive logging of native forest to supply the raw materials for the woodchip mill and these new ancillary activities: the sawmill, the briquet plant and the pallet operations.

When the current owners of the woodchip mill acquired that asset they talked about their intention to transition to plantation resource for their activities. And their use of plantation sourced wood has increased. But native forests continue to be decimated by intensive logging for woodchips. Not just in the publicly owned forest in the Bega Valley Shire – which yield no Council rates – but also in neighbouring Shires including East Gippsland, Eurobodalla and even up to the Shoalhaven and the escarpment forests.

When woodchipping started 50 years ago it was justified as using the forest waste which was useless as sawn timber. But actually the increasingly heavy and expensive machinery has laid waste to the logged forests as well as driving almost all of the previous sawmills out of business. Some compartments in Yambulla and Tantawanglo logged recently have yielded 100% woodchips. So much for waste.

If the DA were to be approved then one of the conditions of consent should be a clear timetable to complete the transition from native forests to plantations.

Recent research by eminent academics at leading Australian universities including Professors Brendan Mackie, David Lindenmayer and Tony Norton have published peer reviewed analyses showing that the current intensive logging practices in remaining native forests are anathema to carbon storage which the world so urgently needs to deal with the climate emergency, are destructive to the habitat of native animals – particularly those dependent on hollow bearing eucalyptus trees in multi-age forests – and inconsistent with the production of finegrained old timber.

The proposal is the latest stage of commodifying the forests to make them yield the highest volume (lowest unit value) industrial products. Any prescriptions supposed to ameliorate the impact on animals which are otherwise destined for an untimely death by logging have to be made "resource neutral": but too much logging can't be so nicely contained.

I suppose that some may argue that what happens offsite under the regulatory regime of a different set of State agencies can't or shouldn't be subject to debate in consideration of this DA. And yet the impacts of noise, water and particulate emissions are considered as are the consequences of increased traffic flows on the road network beyond the chipmill's electrified fence. And the consequences of the activities at this site for the native forests hundreds of kilometres around the chipmill are profoundly and disturbingly influenced by the volume of wood fibre processed there.

I don't suppose that tour boat passengers will appreciate how much of the remaining native forests they can view in the towering piles at the Southern tip of Twofold Bay when cruise boats resume their visits to Eden.

Other considerations which should prevent a rapid and covert rubberstamping of this proposal under the opportune cloak of the Covid-19 crisis include the bad impacts on wildfires caused by intensive native forest logging which lasts 40 years after logging because of the dense unregulated single height regrowth forests. There are currently two inquiries – Commonwealth and State into the devastating fires of the recent summer and their findings should help inform consideration of this DA.

Likewise, the anti-competitive consequences for having a single buyer of logged trees from the public forests of the Eden Management Area should also be considered. If the State agencies responsible for regulating forestry activities haven't already been captured by industry then the probability of that outcome occurring in the future only increases.

While this new information is being gathered and considered it would also give the chipmill an opportunity to retrospectively apply for regularisation of the size of its woodchip piles. I thought it displayed a degree of chutzpah for the proponent to suggest that the height of the sheds not be a problem because they were lower than the existing smoke stack and dwarfed by massive woodchip stockpiles.

I understand that the State Government has budgeted \$3million to aid the briquet plant commissioning and that the Forestry Corporation's wood supply contracts are dependent on development consent for the sawmill project but that shouldn't force your hand nor should it entrench an expensive but already outmoded approach to decimating remaining native forests while pretending to extract value from them.

If we are serious about tackling climate change then the very last thing Council should be doing is giving the green light to processing activities that will surely unlock the considerable stores of carbon currently so superbly sequestered for nature in and by the remaining native forests.

Keith Hughes. 13.05.2020