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

Submission from Harriett Swift, PO Box 915, Bega NSW 2550

1. Scope

The application has a narrow focus on direct impacts within Lot 16 DP 1066187. In reality, the consequences of this development will extend far beyond the boundaries of that property; indeed they will extend beyond the Bega Valley Shire and even the State of NSW.

These impacts are immense and overwhelmingly negative. The consequences for native forests, wildlife, water quality and quantity and CO2 emissions should all be assessed and considered.

In its various assessments of air quality, noise impacts, water resources and quality and motor vehicle traffic there are no geographic limits to the consideration of impacts, provided there is a direct connection. Assessment of impacts on forests, wildlife, and other environmental factors should include the entire supply zone.

2. This DA, if granted, creates a monopoly buyer for every log produced in the Eden Region

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">https://www.forestrycorporation.com.au/ data/assets/pdf file/0006/1214637/allied-natural-wood-exports-pty-ltd-hardwood-forests-sawlogs.PDF

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

BVSC resources have been misused to boost the development, and there may be a conflict of interest, or the applicant has understated the cost in order to minimise fees. These matters need clarification.

4. Stops a transition to plantations for the woodchipping industry and perpetuates intensive native forest logging which has already so degraded the forests of the region

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 m3p/a. Ninety six percent of hardwood sawmills in Australia² are less than 45000 m3pa throughput.

In addition to this, it would continue to produce typically over 600,000 tonnes of woodchips a year.

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

² ABARES 2019

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5. Bushfire impacts have been ignored

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

In the summer bushfires, 80 percent of the forests available for logging were 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 are in no position to recover.

Further, there is growing scientific evidence³ 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.

6. 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.

7. 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 50 percent.

8. Previous matters before Council

The Statement of Environmental Effect 2.2 lists previous Development Approvals granted 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.

9. 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.

³ <u>https://www.theguardian.com/environment/2020/may/06/compelling-evidence-logging-native-forests-hasworsened-australian-bushfires-scientists-warn</u>