

Pulp Mill Permit Speech on Motion August 29th 2007

Hon Ruth Forrest MLC, Independent Member for Murchison

Introduction

Mr President, I rise to make a contribution to this debate in what is possibly to be the biggest decisions that I will be called upon to make in this place. It is certainly the biggest decision thus far, and no-one knows what will come before us in the future, but I personally hope we don't find ourselves in a similar situation again, where another, what should have been a, thorough, independent, rigorous and transparent assessment process, fails.

I have found this a very difficult decision to make in many ways as during this debate and entire assessment process, highly qualified experts have presented expert views and advice that at times has been poles apart. We have also heard what I would consider is convincing evidence that this pulp mill will, if successful, be one of the most modern pulp mills in the world; that will be used as a benchmark for future pulp mills built around the world. There are though, a number of areas that have been raised during the many briefings, from both those in support of the project and those opposed that have to be considered when making my decision. What I need to decide is, has this assessment process delivered the results I believe are necessary, in the interests of Tasmania, to tick off on all the issues that have been identified through the assessment process before us and will this pulp mill meet the guidelines established through the RPDC process.

Mr President, my contribution will include some technical information as this is a highly technical proposal, and for me to form a considered and informed decision on this matter, for me, it was imperative that I undertook the level of investigation I did, so I make no apology for the technical and perhaps in the minds of some, boring detail.

At the outset I wish to confirm some of the statements I have made at other times and views I have, regarding the importance of the forest industry and downstream processing is and should be to our state of Tasmania. I have been and continue to be, a supporter of a sustainable forestry industry and particularly downstream processing.

I have also and will continue to be a strong supporter of sustainable development in Tasmania and I firmly believe that new development is critical for Tasmania's on-going economic future particularly if we are to continue to experience the economic growth and opportunities that Tasmania need and deserves, sustainable development must be encouraged, welcomed and facilitated.

However, any development must not be at any cost, it must be appropriate and sustainable; it must be development that will positively enhance our State, provide opportunities for our youth and encourage investors to seriously consider Tasmania as THE place to invest.

If this is to be the case, we need to ensure that we have an appropriate, independent, robust and rigorous assessment process that can assess projects in a timely manner. Such a process must provide developers with a level of certainty about any process, including a reasonable time frame. Without this potential and current developers will be less inclined to approach Tasmania as a potential location for development.

We do not need to see developers continually frustrated by red tape and delays, that may not be of their making. In saying that, I am not suggesting that some of the delays in the RPDC process were not of the proponents making in this case, or that the RPDC cannot fulfil the necessary assessment role in the future, but clearly, on this occasion that process failed and must be looked at as a matter of urgency, to ensure inappropriate Government interference does not occur in any future development assessment processes, and an appropriate assessment process is re-established to avoid a situation such as this in the future.

I believe there is as much, if not more opposition, to the process under which this proposal has been managed and the appalling way this Government has acted and interfered in the assessment process during this whole sorry saga. There have been many examples of, and much public debate regarding, the inappropriate interference and actions of the Government in this process, that has completely undermined the assessment process and destroyed public confidence in the assessment process. Even people who fully and unequivocally support the building of a pulp mill, have very little, if any, confidence in the process that is before us at this time.

Just one example that I found particularly appalling was the way the Leader stated that on the release of the Sweco Pic report, that the report provided all the information that was needed for anyone to accept that this proposed pulp mill would meet all the guidelines and requirements.

Transcript states 'the Government's done all its homework on this. I mean, the reports that have been produced are now in the public domain, that have examined all of the RPDC guidelines in relation to this project. That's the homework. The homework's been done.'

This comment was made without even seeing or knowing in any way shape or form, the permits and conditions that would be developed by the regulatory bodies, these permits and conditions that have only been available to us as the final decision makers since last Tuesday. I would suggest that actually seeing and understanding these permits and conditions would be essential to make such a statement.

If I, or any other decision maker in this debate can be confident that the areas identified in the Sweco Pic report where the emission guidelines were not going to be met, possibly could be, I believe such a decision could only be made with this information before us. I found the Leaders comments at that time to be misguided and potentially undermining of the work I and the other independent members were doing and have done to inform ourselves to be in a position to make a well informed decision based on fact not pulp fiction.

I stated during my election campaign 2 1/2 years ago and stand by the commitment made at that time, that I support a pulp mill provided it meets strict environmental standards. The proposal before us is a pulp mill that is being assessed against the rigorous and high standards of the emission guidelines that were prepared through the RPDC process. I have been personally informed by many sources on both sides of the debate that these guidelines are among the strictest and most rigorous in the world.

Mr President, this debate, unlike the Pulp Mill Assessment Bill debated some months ago, is about the pulp mill project. It is no longer about the process as the last debate on this matter was. What we are here to do is to debate a motion to either support or reject the pulp mill permit described in this motion. Whether any of us, and I in particular, supported the previous decision to see us at this point is now irrelevant. We must fully consider the motion, and thus the pulp mill permit before us.

This permit, if accepted, would see arguably the most highly regulated industry in Tasmania, and possibly the world. Our briefings highlighted that, and even the proponent has stated publicly that the conditions are so rigorous, they are not sure at this time that they can be met. Mr President, that is a matter for the proponent, not this parliament, and I believe should not influence my decision.

As a member of Parliament, I have been charged with this responsibility to be satisfied that if this pulp mill is approved, I need to be fully convinced that it will meet the established guidelines, either through the design of the mill or where that has been identified that the design alone will not achieve this, then through the restrictions placed on the mill through the permits and conditions before us. That is now our challenge.

Decision to support this assessment process

Mr President, Members and the public would be well aware that I voted in favour of the assessment process that has brought us to this place now, to make the final decision as to whether this proposed pulp mill should proceed or not.

The fragmentation of the assessment process was and continues to be a major concern for me. I did ask the question at that time, will this bill or what now is the assessment process, stop an inappropriate project from going ahead and, further, will this process also ensure that an appropriate project will have the opportunity to proceed with or without conditions? In making my decision I did consider relevant and important definitions, including definitions of the accepted modern technology.

In the State Policy on Water Quality Management 1997 and the draft Environment Protection Policy (Air Quality), accepted modern technology is defined as 'technology which has a demonstrated capacity to achieve a desired emission concentration in a cost-effective manner, take account of cost-effective engineering and scientific development and pursues opportunities for waste minimisation'.

I fully accept that mill designers Pöyry, are a very highly credentialed and credible organisation with vast experience and expertise in the field, and they are certainly

unlikely to jeopardise their credibility by providing assurances in these areas unless they were very confident of these assurances.

However, with an untried technology, in the form proposed for this pulp mill, such as the incinerators to improve the odour abatement, even though logically and technically it seems almost foolproof, I believe we do need to trust the word of these experts as we are informed that there is no other mill anywhere in the world with the same systems to seek clarification of the efficacy of these measures.

When considering the definition of best available technique, this is defined in Article 5 of the Stockholm Convention on Persistent Organic Pollutants as meaning 'the most effective and advanced stage in the development of activities and their methods of operation which include the practical suitability of particular techniques for providing in principle, the basis for release limitations designed to prevent and, where it is not practical, generally to reduce release of chemicals listed in part 1 of Annex C, and their impact on the environment as a whole in this regard. Techniques include both technology used and the way in which the installation is designed, built, maintained, operated and commissioned.

Available techniques means those techniques that are accessible to the operator and are developed on the scale that allows implementation in the relevant industrial sector under economically and technically viable conditions, taking into consideration the costs and advantages. 'Best' means most effective in achieving high general level of protection of the environment as a whole.'

As I stated in an earlier contribution, these definitions are quite comprehensive but relate to technologies that have an assessment process because they have been around long enough to do that. Many experts in the relevant areas continue to raise concerns regarding the effluent from this mill and its impact on the marine environment, however there are also a number of experts who inform me that there is no issue of concern with the fluid effluent from the mill, that it is clean enough to drink and in some countries around the world, effluent is pumped into bodies of water from which drinking water is also taken.

One could ask that if this is the case, why is all this fluid effluent not recycled back though the mill to support the ongoing pulping processes? Clearly there are elements in the effluent or waste water, that make this impossible.

Suggestions by the Member for Huon, that we really could dispense with the term effluent and use waste water instead, does not really change anything. I could ask, that if I told you I was suffering from a blood dyscrasia, would you be as concerned as if I told you I had terminal leukaemia? At the end of the day they are the same thing and could actually kill me.

Either way, what is of concern to me personally, and to many others as well as being highlighted in the Sweco Pic report, is the absence of appropriate and comprehensive hydrodynamic modelling. As I also stated in an earlier contribution, I believe there should have been a commitment by the Government to undertake a social and economic impact assessment that considered both risks and benefits. This did not occur and as a result it has been quite difficult to get a clear sense of the entire

proposal and be able to weigh up risks against benefits, in other words consider the residual impacts.

It should be noted that impact and risks are not necessarily the same. The impacts are often called consequences, particularly in reports prepared by consultants. The residual consequences or residual impacts are what are left after everything has been done or can be done or is done to mitigate the harm. Risk, as opposed to impacts, measures how likely this is to occur. Risk and impacts are often confused. While risk can be low due to a low probability of occurring the consequence can still be quite high.

As during the previous debate, I have also had representation from people who work in and rely on the forestry industry and who are very much in support of a pulp mill, but they also acknowledge that any pulp mill must meet strict environmental guidelines to ensure that it is good for all Tasmanians. Therefore, in order for this proposal to get the required approval, I believe that almost all, if not all, people agree that this proposal must meet the guidelines that have been established.

I also raised some concern regarding the absence of a comprehensive environmental impact assessment. EIA's have an important role in informing decision making and to ensure access to a full range of information on the consequences of a development. This is both so that the facts can be corroborated and if necessary the public and other interested parties can provide their own material to support the process.

EIAs are not about making the decision, they are about informing it. Experts in the area of environmental science and ecology, have raised concerns that the absence of a EIA in this case, undermines the process and makes it more difficult for the decision makers - in this case Members of this House, to make an informed decision as to whether the consequences are acceptable or not.

A robust environmental management plan is needed and must be included in the permits and conditions before us and must contain rigorous monitoring and a set of protocols that can be put in place to further offset harm if something does go wrong. The framework for this should be quite explicitly set out in any approval - does this permit provide this? I will come to that when I discuss the actual permit and conditions before us.

Before doing this I believe it is important to provide information about measures I have taken to inform myself during the debate and my overall assessment of the industry to Tasmania and the proposal before us.

Downstream Processing

When considering the issue of downstream processing, it has always been a significant concern to me, and others, that our valuable timber resource, a resource that has the capacity to provide significant employment and economic benefit to this State, has been sent offshore for processing in the form of woodchips when the capacity to downstream process does exist and should exist in Tasmania.

When our resource is sent offshore for processing, the jobs go offshore too. We need to keep these jobs and workers in our State, even though there is a low unemployment rate currently, this will not always be the case and any opportunity to increase employment opportunities and economic growth in Tasmania, must be seriously considered.

We have seen some recent examples of expansion in the area of downstream processing of our timber resource including the veneer peeler mills in the Huon Valley and at Smithton. Clearly, all options for downstream processing should be considered and investigated, including a pulp mill.

It should be noted, however, that even if this proposed pulp mill does go ahead, the woodchip exports from Burnie and Triabunna will continue, with very little, if any reduction. Therefore, whether this mill is approved or not, other downstream processing opportunities should be investigated and hopefully supported and encouraged by this State Government as much as this project has been.

Of course, I would strongly recommend that any proposal for downstream processing in the future, regardless of what it is, should undergo an independent, open and transparent, rigorous assessment process, as opposed to the process we have seen this proposal undergo.

When considering downstream processing more fully, as this proposed pulp mill clearly is, the questions do need to be asked.

Is this the right downstream processing, at the right time and in the right place? Whilst these questions are not necessarily an integral part of this debate, I do believe it is worth considering.

Is a Pulp Mill the most appropriate form of downstream processing at this stage for Tasmania? With the current national and international economic climate, pulp and woodchip prices and supply issues, the subject of many analyses by many economists and others involved in the pulp and paper industry, I would suggest that the answer to this question is anything but certain.

Should Tasmania be actively pursuing other downstream processing opportunities? Are there other opportunities that may provide as good a return over time, with less risk? A Pulp mill of this size in a State the size of Tasmania, is really putting all your eggs in one basket. If there is a significant threat to the pulp market, such as through more competitive markets in other parts of the world, are we putting Tasmania at too greater risk through the size of this project?

I am not an economist, or a pulp or woodchip industry expert, and I don't have answers to those questions, but I can see that the potential risks here should not be ignored.

When considering whether this is the right time for this project, many would strongly argue that it definitely is. When considering the future of the timber industry in Tasmania, many experts suggest that it is imperative that this project goes ahead if Gunns and forestry in Tasmania as we know it is to survive. However, as with all

issues in this debate, there are many other experts with opinions with a differing view. There have been suggestions that advances are being made and ongoing research into technologies within pulp mills that will result in reduced emissions in both the air and liquid emissions.

The other question, is this the right place? There have been many suggestions from many experts and non-experts that the Tamar Valley poses challenges with the topography and meteorological aspects of this region, as well as the close proximity to other industry including tourism and wine growing. For this reason, many local residents have expressed concerns about such a big development with not only the air and potential odour emissions, but also the visual impact of a mill releasing a lot of steam which will be visible for considerable distances, particularly when the ambient air temperature in the region is low, as is more often than not the case in the Tamar Valley region during all but the summer months.

It must however be remembered that the proposed site is within an established industrial area, an area that has a number of other heavy industrial activities that also have some impact on the air and visual amenity of the region. However, it could also be argued that this is not a reason to add another development in this area if it is likely to have a negative impact on the region. Rather we should look at reducing the impacts of the existing industry and other sources of air pollution in the region, and improving the area overall.

It should also be noted that in other parts of the world, pulp mills are assisting in this process of cleaning up rivers through the treating of effluent and sewerage from neighbouring villages that currently pump raw sewerage into the waterways. Whilst this is not an issue in Tasmania, overall or residual impacts and benefits should always be considered with any proposal.

Employment in Forestry

I certainly appreciate the importance of the forestry industry to the State and particularly to my electorate. Forestry is a large employer in a number of areas in Tasmania and the jobs of forestry workers are just as important as any other industry or business in Tasmania.

It is important to note that we have been informed during this debate that there will be no job losses in forestry if the pulp mill does not go ahead, as the timber is already growing and will be harvested when mature either for a pulp mill or as export woodchips.

However, as we know there will be an increase in jobs overall, but not necessarily in forestry operations, if the pulp mill proceeds. Even if other downstream processing opportunities were established, and I for one certainly hope this is the case so that we may yet see no woodchips shipped offshore for processing from Burnie or Triabunna, the jobs in forestry operations themselves would possibly not grow significantly. The jobs growth would occur in the other downstream processing ventures.

Regardless of the outcome of this debate, the importance of a future for forestry workers and the forestry industry will remain.

Informing myself

During the time leading up to this point we are now at, a point that many members of the public feel we should not have got to this point at all, however, here we are and we must make a decision, as we have been elected to do, I have spent much time, energy and resources informing myself of the issues, concerns, practicalities and operations of a modern pulp mill and other relevant aspects of this debate.

Of the people or organisations I consulted during this time, they have been from varied backgrounds with varied views on the proposal.

Those I would consider Pulp Mill supporters include:

A number of Pulp Mill experts who have worked for decades in pulp mills, both in Australia and around the world and the forestry and pulp and paper industry.

Senior lecturer at the Pulp and Paper Institute at Monash University.

Mill designers Pöyry.

Representatives of the Forestry Industry including TCA and others

I have also sought scientific opinions:

Water experts from a variety of backgrounds, however, this approach has sometimes led to what I refer to as duelling PhD's. A situation I guess is to be expected in some degree due to the highly emotive issue, and the difficulty we seem to experience in any area of science in getting scientists to agree!

Ecologist

Air emission and air quality experts/scientists and again the conflicting opinions is an issue and challenge.

Medical and health professional's opinions.

Economists

Those I consider opposing or concerned voices include:

The Wilderness Society and other environmental groups.

Surfrider Foundation

Local tourism operators and vineyards.

Residents of the region with concerns in a number of areas, including air and water emissions, road traffic, health impacts, water usage to name a few.

There are others who have petitioned me on a number of fronts both in support of a pulp mill and opposed, but this gives a broad overview of the breadth of enquiry I have made and should demonstrate that I have been willing to and do give time to all sides of the debate. I do read every email and letter that comes to me and reply to as many as possible. Obviously, the last two weeks has seen very little opportunity to respond to submissions due to the volume of work that has been before us in this pulp mill permit we are now debating.

It should also be noted that the opposing voices are not just the radical dark green groups who oppose almost everything. The opposing voices come from many and diverse backgrounds, including legal, health, environmental, business, a variety of science backgrounds, engineering, a variety of industry, ecological, rural, with highly educated Tasmanians as well as community members without university education who are concerned with both the assessment process this pulp mill proposal has taken as well as the social, economic and environmental impacts.

Comments have been made by colleagues and a representative of the proponent that 'any thinking person could see that this proposal will meet the guidelines and should be built'. I would suggest that 'any thinking person could see, that this proposal does require a thorough and rigorous assessment of a project that may have environmental, social and economic impacts and benefits that all require consideration'. In my mind, it is not and has not been a clear cut decision that 'any thinking person' would support.

Pulp Mill Trip

One important part of informing myself in this debate was to undertake a pulp mill tour to visit overseas pulp mills and talk with 'locals' who live and work near these mills. Whilst language was a bit of a barrier, this was overcome and meaningful interaction and consultation did occur.

Initially, I stated that I would not attend an overseas tour as I felt it wouldn't necessarily provide me with any information that could not be obtained by other means, however, on further consideration, I felt that if I am to stand in this place and confidently state that I have done everything I possibly could to inform myself in this debate and to make this decision, I needed to physically look at and experience a modern pulp mill, that was as much as possible, using modern technology that is similar or the same as the proposed mill we now have a permit to either accept or reject.

This decision was made in the face of some quite public criticism as well as some unfortunate emails from people who did not bother to take the time to ask why I had made the decision to attend.

Emails such as one from a Bob Bird from Bream Creek which stated:

Independent?

Are you really as stupid as you appear?

Do you think the public are too?

Enjoy your junket!

highlight the depths some people go to undermine and judge our actions without actually discussing the issue.

I acknowledge that the trip came at a cost to the taxpayer, but the decision I have been called on to make is a very big and important decision, that can only be made, I believe, by fully informing myself in as many avenues as possible. Some of these measures I have taken in addition to the pulp mill trip, I have already mentioned. I can honestly say my entire trip overseas, including talking to concerned locals in Chile, certainly has not influenced my decision, rather the entire trip has informed my decision.

I am quite disappointed by the attitudes and comments of some of my colleagues, who saw fit to attempt to discredit aspects of my discussions with concerned locals, and the value and motivation of my enquiries, particularly due to the fact that the trip was organised by an international organisation, the Surfrider Foundation, that I was well aware had a strong environmental arm to their organisation.

I would like to place on record that I requested assistance from more than one source to gain access to locals involved in the winemaking industry, health, fishing and tourism. These being areas of concern to many Tasmanians in this debate. It soon became evident, with such a short lead in time, the amount of time on the ground in this region, language barriers, the isolation of these communities and lack of access to transport, that opportunities were limited - as indeed the rest of the group also discovered.

I am grateful that an international organisation such as the Surfrider Foundation had the resources and capacity to arrange a trip at short notice, across timezones, to see not only people I wished to see, but also people they were aware of, through their environmental activities, they wanted me to talk to.

I believe this was particularly important in light of the fact the majority of the rest of the trip was facilitated by the proponent, to mills chosen by the members of the delegation, due to the same sort of difficulties we would have encountered in accessing the mills at short notice, within a very tight and I would personally suggest quite gruelling schedule and language barriers as well as providing the valuable opportunity of spending the best part of a day in meetings with the Mill designers Pöyry and supplier Andritz. These briefings were very valuable and informative.

As with any debate, particularly any debate that has the capacity to cause divided opinions and concern, I certainly attempt to and intend to continue to listen to all sides of a story and consider each point of view. I firmly believe that it is only through this open minded approach that I find myself in a position to make a fully informed decision in this debate.

People and the media certainly have asked did my visit to see modern, new, 'world's best practice' pulp mills in South America convince me to support or not support this

proposal before us. The same people have asked, did your discussions with the people in the regions surrounding the pulp mills we visited convince me either way?

The answer to both is no. The entire overseas trip and all the other work I have been doing, all form a part of working my way through this task of deciding whether I will support or reject the proposal before us.

The information I received from neighbouring villages and communities of the Neuva Aldea Mill, did reveal issues that were also identified by others in the group on discussion with locals, that during the commissioning phase in particular, odour events were reasonably common and unpleasant. Mill management also stated that odour events had occurred, certainly more frequently during commissioning.

I was concerned to hear that neighbouring vineyards had experienced a downturn in drive by cellar door sales since the mill had begun operation, particularly in view of the fact that as these vineyards are located on the main highway between Santiago and Concepcion and expansion had been planned by one operator, but had been abandoned due to this downturn. We were informed by the mill management that they conduct tours for tourists from a lagoon area some 60-70km away, from memory, and that approximately 20,000 people had visited the site on these free tours. The disappointing aspect to this in my mind is that as the tour bus left to return the visitors to their accommodation many km's away, they didn't take them via a cellar door or two, or into the local village to allow the local community to benefit from the tourist dollar. If this did occur, surrounding industry and business may feel less disenfranchised by the location of the pulp mill.

Comparisons

The trip overseas, as I stated was very useful in many ways including seeing first hand what a modern Pulp Mill looks like as well as how they operate, what challenges they have faced, particularly during the commissioning phase, and how there were dealt with.

It is difficult in many ways though to make direct comparisons to the project before us as there were significant differences in the areas of location, proximity to resource, and socio-economics of the region, meteorological and geographic differences.

The two most similar mills located in South America in terms of technology and processes were both located in quite remote and socially disadvantaged communities. The Veracel Mill in Brazil was located in an ideal location in the middle of the Eucalypt plantations with a crop rotation time of approximately 7 years. These trees grow to 35m in this time - although they were quite slender trees, as a result of the type of tree, temperature and rainfall. The location was very flat - hardly a hill of any description in sight and approximately 20-30km away from the nearest village.

The Nuvea Aldea Mill in Chile was located in the Itata valley, not a valley that you could totally compare with the Tamar Valley, but was in a much cooler climate, much like Tasmania and close to the Itata River. This mill was closely surrounded by vineyards and the neighbouring villages were only a few kilometres away. The tourism industry was not focused close to this mill, but approximately 50-60km away

towards the coast. There was no river fishing industry, but an important, and quite lucrative I believe, fishing industry in the ocean.

Discussions with mill neighbours

Because of these similarities, as well as the acknowledged differences, I organised my trip at this location to talk to as many locals as I could in the time available. I did prepare a written report that reports what I was told by the people I met. I did not, and do not, make any assumptions about these comments, including whether the occurrences of gastrointestinal upsets and headaches that occurred predominantly in children, were directly related to the odour events experienced at the time.

The health professionals I spoke to didn't either, they merely stated that these events had occurred. As a health professional I know how hard it is to establish causal links in such events and certainly would not attempt to do so with such limited information.

My discussions with neighbouring vineyards did reveal odour events had occurred quite frequently during the commissioning phase, and less frequently during operation, however, when the wind was blowing in the direction of the vineyard, I was informed that odour events were quite frequent in occurrence. I was informed that drive - by cellar door sales had dropped since the mill had been built, especially when steam and other air emissions were blown across the highway in the direction of the vineyard. This is the major highway from Santiago, the Chilean capital to Concepcion.

There was comment by one vineyard owner that a vineyard 20km from the mill had had an 80,000 bottle wine order rejected as the Mill Management had not issued a certificate to state that the mills operation would not impact on this product that is sold as an organic wine. The Mill Manager has confirmed that no request was made.

I did not speak directly to the owners of this vineyard but I did access a media report and will quote from the translated version due to my lack of Spanish!

I have a media release here from a Chilean site, and I want to read briefly from that as it explains maybe that was not the case and it was not a document that was required. This is Santiago, Chile, 31 May 2006:

'An important deal consisting of 80 000 bottles of organic wine between Itata wines and Sweden was rejected a few days ago due to the damage done to the Itata region's international image after the installation of the Celco pulp mill. This is how the information was released by the representative of Itata wines' Heinrich Männle. He is the owner of Männle Wine, situated 20 kilometres from Chilaan in a small valley of El Naranjal in the Octavia region.'

Further on it says:

'The vineyard manager specified that he had 80 000 units of high-quality organic wine ready for shipment to the European market. However upon hearing that this wine was to be sourced in the Itata River basin where Celco was to commence their operations and pump effluent directly into the river as well as emit air contaminants, the buyers took a step back.'

Again it is a media release that I cannot hang my hat on, but it seems that the location of the mill may have impacted on this particular wine order.

It must be stated at this point that the odour abatement measures at this mill are not as comprehensive in many ways as the proposal before us now, another reason why direct comparison is inappropriate. Odour events at the proposed Gunns mill should be much more efficiently and effectively managed if all odour abatement measures are used as planned.

The economic benefits to the neighbouring villages, was also an issue that was discussed with locals. The general comments suggested that during construction, there were benefits to local villages and a number of locals were employed. However, during the commissioning and operating phase, very few locals were employed even in the forestry operations as contractors were generally used, whose workers were sourced from other areas, particularly the bigger towns and cities. These contract workers generally came to the area, stayed in onsite vans and the like and then moved on. The only real benefit was in providing food to these workers.

People felt this was often due to the fact that the mill required skilled workers and the poorer education standards and opportunities in the small villages meant there were not many locals who had an opportunity to fulfil these roles. This is another aspect that is not comparable with Tasmania, where education standards and potential to increase training opportunities for all Tasmanians is a reality. The biggest challenge will be getting enough skilled workers even with our education standards and facilities.

I also had discussions with tourism operators, concerned residents and the Mayor of the coastal village, Cobquecura that is a growing tourism destination with significant building going on in this area, an area that has a great surf beach. The major reason for their concern, being approximately 50km away from the mill is that the mill is currently constructing a pipeline to pump the wastewater effluent out to sea. The currents in this area flow from south to north and there is concern among the tourism operators and fisherman, who have a well established industry in this area, is that effluent will flow to this region.

The pipeline is being constructed along the Itata River, under the mouth of the river and then out to sea. This area is an area that has a high risk of earthquake and last year torrential rains washed away the river mouth. The locals are concerned that in such conditions the risk of the High Density Polyethylene (HDPE) pipe being damaged or rupturing in such circumstances is significant, hence their concern.

The information I gained during my investigations included advice from all I spoke to that if any mill is to go ahead that very tight regulation is needed and a regulator that is completely independent of Government and the proponent is vital. There were also numerous suggestions that significant sanctions for breaches of conditions and emission limits were essential.

Discussions with Mill Management

Discussion and briefings as well as on site inspections of the pulp mills we visited were very open and comprehensive. At the Veracel Mill in Brazil, we actually were in attendance at a time when the mill was experiencing an interruption to normal production and parts of the mill were undergoing partial shutdown and start-ups during this time. This is a time that can potentially result in odour events. Any odour I detected at the time of our visit was minor and not for any lengthy duration.

I would suggest that the fact that our delegation was given access to the mill at this time and to actually observe the correction of this problem showed that the Mill management were very open and upfront about their mill operations. They also had the Australian flag flying at the mill gate!

These visits and briefings were very informative and certainly highlighted the differences between the old mills of the past and what new modern mills are all about. The control room would put our IT in this place and possibly many others to shame!

Amendment of permit - by Gunns, by Parliament

The capacity to amend this pulp mill permit does not bother me as I am of the firm opinion that this permit must be able to achieve the high standards that Tasmanians expect and demand if a Pulp Mill is to be built anywhere in Tasmania.

As these permits and conditions have been prepared by the regulatory bodies, the very bodies that will be responsible for ensuring the permits and guidelines are met - I need to be convinced that this permit is able to achieve this and meet all the requirements that I and others believe must be met, and that the regulatory bodies have the power, teeth and capacity to monitor and oversee this development and to impose significant sanctions in a timely manner should a breach occur.

Best Available Techniques (BAT)

Stephan Antell from mill designers Pöyry stated in a briefing that to build the best pulp mill in the world is easy to say but not as easy to do! I do believe that he believes Pöyry are well up to the task.

Much has been said about and the term BAT often used in this debate. I wish to read the definition of BAT from the IPPC Best Available techniques in the Pulp and Paper Industry.

This definition of the term best available technique is described in the preface and states that; 'This description is inevitably incomplete and given for information only.'

So it is just to guide us, I guess. But the term 'best available techniques' is defined in Article 2.11 of the directive as –

'the most effective and advanced stage in the development of activities and their methods of operation which indicate the practical suitability of particular techniques for providing in principle the basis for emission limit values designed to prevent and

where it is not practical generally to reduce emissions and the impact on the environment as a whole.'

Article 2.11 goes on to further clarify this definition as follows:

'Techniques include both the technology used in the way in which the installation is designed, built, maintained, operated and decommissioned. Available techniques are those developed on a scale which allows implementation in the relevant industrial sector under economically and technically viable conditions taking into consideration the cost and advantages, whether or not the techniques are used or produced inside the member state in question as long as they are reasonably accessible to the operator and best means most effective in achieving the high general level of protection to the environment as a whole.'

It does go on further and describes it in a little bit more detail which I will not go into, Mr President. I wanted to read that out because when we look at this permit I will ask the question: are this permit and project really considering a mill that employs the best available techniques as defined, or the best available techniques at the price the proponent can afford? I think it is an important point because effectively you probably could build a mill with many other techniques that may clean up or reduce the effluent in the water, and we did hear in a briefing that you could put in a special filter that would remove almost all, if not all, the suspended solids in the effluent, but that comes at a price of about \$54 million.

Is this permit and project really considering a mill that employs the BAT or BAT at the price the proponent can afford. I believe this is the case, because a number of representations from very experienced and qualified people and my own research has confirmed that there are a number of techniques that can be used to further reduce air and water emissions to significantly lower levels, however, these techniques and equipment do not come cheap. Millions of dollars or further investment would be required above what is being proposed to achieve this.

This is why many modern mills around the world do not use these techniques, they would most likely not be economically viable if they did, therefore what we are seeing around many parts of the world, and what I personally saw on my overseas investigation of modern pulp mills is that indeed, these mills use accepted modern technology or the perhaps misleading term, world's best available techniques, at a price they can afford to be profitable.

Whether this is a reasonable approach and whether we should accept this in Tasmania, is open to debate. If this debate is to be had - and perhaps in many ways it is being had through this process, I would hasten to add that the proponent has already stated publicly that these conditions and permits are so strict and tough, they may not be able to meet them, therefore I would suggest that to expect the proponent to spend an extra \$100M + on other techniques to achieve emission standards that many other modern mills around the world currently don't, would potentially make this project unviable.

I do have concerns that comments made by Mr Gay of Gunns, that some of the conditions are so strict that they may not be able to meet them, that I would hope he would be very up front about this and clearly identify which conditions are posing

those challenges. I believe that if any conditions cannot or may not be able to be met, particularly the environmental conditions that this project should not proceed. Why take the risk of building a mill, that at the end of the day may not be able to operate within these conditions and permits. I am sure the Gunns Board are giving this issue very close scrutiny.

I think the last thing that any of us would really want to see, is this mill go ahead, only to find that to meet these permit conditions, significant further capital expenditure was required and without Government support the project would fail, as some other mills around the world have experienced, that is either failure of Government financial assistance to enable the mill to continue operation.

Many would also be aware that the World Bank has released draft Environmental, Health, and Safety Guidelines for Pulp and Paper Mills on June 15th this year. This document is quite broad brushed in its approach, more about identifying what the sources of environmental, health and safety adverse impacts may be and considering what Best Available techniques may be.

These draft guidelines do not make any comment or suggestion as to the actual level of emissions, it does state that chlorinated dioxin and furans are produced and make the following comment -

"These are an important issue when elemental chlorine is used for bleaching although the levels of dioxins discharged are below the level of scientific significance when ECF or TCF bleaching technologies are used."

It will be interesting to see what comments are made by international bodies and experts currently debating and attempting to identify a safe, if a safe level exists, of chlorinated dioxins and furans, and what advice will be provided to the World Bank in commenting on this draft document. It should also be noted that emerging technology was to be considered under the Emission guidelines when determining what is Accepted Modern Technology AMT as per the terms of engagements that engaged the consultant Sweco Pic, particularly related to the processing of pine or soft wood, I could ask has this been done in this process - it is a bit hard to actually see evidence of this. I saw little evidence of consideration given to accepted modern techniques in the pine processing side of it. Remember that the final scope guidelines brought the pine or softwood into it, not the emission guidelines. From my five days of looking at the permits and conditions, I cannot see that has been clearly spelt out. Perhaps the Leader may have more to add to this in his reply.

Baseline Monitoring

Hydrodynamic modelling has been identified by almost every qualified commentator in this debate as being inadequate. It has been identified in many submissions to the RPDC assessment, in the Sweco PIC report, by many experts in the field, even though some of these views are contradictory - the nature of scientific review it would appear and the Federal Environment Minister, Malcolm Turnbull. The permits before us also include a condition that further hydrodynamic modelling is conducted prior to commissioning of the Mill.

Whilst we are informed by the Director of Environmental management, that what is needed to meet the hydrodynamic modelling is more fine tuning than a major redoing of the modelling, I would suggest that this one issue alone has caused significant concern within the community at large.

The Federal Environment Minister's Draft Conditions number 19 and 20 resulting from the assessment under the EPBC Act also requires more hydrodynamic modelling.

I ask why we are not demanding that this research, which has been identified by almost every scientific opinion as necessary prior to proceeding, is not conducted prior to approval for any commencement is given?

The necessity of baseline monitoring in areas of health, air quality, water in Bass Strait and the sea bed sediment and sentinel sea life, is to or has been undertaken.

However, I would suggest that baseline monitoring in the area of health really needs to be more comprehensively conducted prior to commissioning of the pulp mill should it proceed, to fully assess the current health status of Tamar Valley residents, particularly after a briefing with Dr Roscoe Taylor, our Director of Public Health, as it would appear that current monitoring does not really consider some confounders such as smoking. I believe it is vitally important to avoid criticism later on, if any adverse impacts are to be rightly or wrongly attributed to the mill. This will only be achieved in the presence of vigorous baseline health data and that could reasonably be collected over the two years that it will take to build it before it is commissioned.

I will be hoping to hear of a commitment to this from the Leader in his reply.

Air Emissions

The issue of air emissions is a very important one, especially with the proposed siting of the pulp mill in the Tamar Valley, an area that has well understood and acknowledged air quality issues, especially in the winter months.

Air quality monitoring in this area, including Launceston, has shown a continual improvement, resulting I understand primarily from the work of the local government bodies in the area acting to reduce wood heater and outdoor incinerators use and thus emissions, over recent years.

One of the major concerns for health professionals, and residents of the region is the ultra fine particulate matter, or PM 2.5, as these are particularly fine particles that invade the human body through the delicate tissues in the lungs, much more so than the larger, and potentially less harmful PM 10's.

On the overseas trip, I asked at each mill about the levels of PM2.5 that they release from their mills and what measures they have to measure and capture these ultra-fine particles.

I was informed at each mill that they don't measure PM 2.5 because it is not a problem with pulp mills, only in industry where heavy metal are burnt or smeltered. I found this somewhat unusual as other discussions I have had with other experts in the field had and continued to advise me that PM 2.5 is released from pulp mills, albeit not in high quantities, are produced in pulp mills and that the electrostatic precipitators that are used to remove up to 99% of PM 10's from the pulp mill stack emissions, are not as efficient at removing PM 2.5.

It has proved somewhat difficult to find extensive research on this issue, in the short time available. However a well referenced article titled "Air Pollutants - Their Sources and Effects" printed this year on the website of the Government of New Brunswick in Canada, does state that PM 2.5 is released from pulp mills.

'These particulates are thought to be of special significance in terms of health impacts, as they have a higher chance of entering and remaining in the lungs if inhaled compared to PM 10 or larger particles. They are sometimes referred to as respirable particles. Particulate matter in the PM 2.5 size range is emitted from industrial and domestic combustion sources including slash burning, industrial processors, for example power plants, pulp mills, mining, smelting and refining, open fires, wood stoves, forest fires and internal combustion engines of all kinds. PM 2.5 also forms when other air pollutants react together in the air.'

It goes on to further say that - this is what the honourable Leader was alluding to 'Transportation, industrial and other fuel combustion account for about 25 per cent of PM 2.5 emitted to the air. The rest comes from so called open sources, which include open burning forest fires, road dust and construction. The estimated emissions from road dust and forest fires are very large and dominate the inventory. Emissions from some source sectors are of greater concern than others in terms of health and other environmental effects. Recent studies indicate that particulate from combustion sources is more biologically active than road or other dust from terrestrial sources. Diesel exhaust is of special concern as it is thought to contribute significantly to the risk of lung cancer. Numerous studies worldwide continue to find significant association between PM 2.5 concentrations and a wide range of health effects including premature mortality, many cardiopulmonary symptoms, reduced activity, increased physician visits and other forms of disability.'

It must be stated that pulp mills are not major contributors to the atmosphere of PM_{2.5}, as the quoted paper states diesel fumes are worse, however pulp mills are a source and adding PM_{2.5} to a airshed such as exists in the Tamar Valley should not be done lightly, especially when we consider the extra trucks that will be delivering logs to this site, most of which would be diesel fuelled. The accumulative effect must be considered.

The British Columbia Provincial Health Officers Annual Report of 2003, titled, 'Every Breath You Take', comments on the sources of PM 2.5 air pollutants and shows that the Pulp and Paper industry accounted for 9% on PM 2.5 air emissions.

In their report there are a couple of graphs that shows that the pulp and paper industry account for 9 per cent; residential wood consumption, 10 per cent; forest fires, 16 per cent. The wood industry - I am not sure how that differs from some of the others - is 16 per cent also. Prescribed burning, 26 per cent and 'other' is 23 per cent. In the big

scheme of things it is not a huge contribution but there is some emission from pulp mills.

I would suggest from this information that PM 2.5's should be closely monitored in both baseline studies in the Tamar Valley and Launceston areas and continuous monitoring during commissioning and operation is maintained. It must be noted that at this time, that there are only advisory level for emission limits in this area, as it is only recently becoming evident that this particulate matter has a high propensity for harm to human health.

Also from Canada I found a paper titled "Towards more innovative air quality management: Proposal for a pulp and paper air quality forum" Smart regulations report from the Forest Products Association of Canada and Environment Canada, September 2004. It should be noted that this was a joint venture between Forest Products Association of Canada and Environment Canada.

It should be noted this report is a joint venture between the Forest Products Association of Canada and Environment Canada, which I thought was great. We have the environment people and the forestry people working together so hopefully we have some overarching consensus in this. The purpose of this joint initiative I thought I would read. It is quite good really.

'The Forest Practices Association of Canada and Environment Canada with critical advice from a group of environmental experts drawn from provincial and industry associations, provinces, aboriginal peoples and the environmental community have developed the concept of a pulp and paper air quality forum'.

This is in their recommendation:

'The pulp and paper industry through FPAC will lead this forum' -

so the forestry industry are leading the forum -

'with a strong commitment to Environment Canada support the forum and work with all parties to make it a success'.

The paper then goes on to discuss the industry in Canada. When relating this to the pulp mill proposal and permit before us, I wish to quote from the same article under the heading "Protecting Human Health and air Quality" as this is an issue that has raised many concerns from not only residents of the Tamar Valley, but health professionals and the Australian Medical Association (AMA).

'The dominant health risk associated with smog is respiratory illness ranging in severity from impaired breathing to mortality. There is considerable scientific evidence of the health risks associated with fine particulate matter PM2.5. In addition to respiratory illness PM2.5 has been linked to cardiovascular anomalies and changes in immune system responses. There is no lower PM2.5 threshold for these health effects. Studies of the direct effects of sulphur dioxide and nitrous oxide both PM2.5 precursors indicate lung function problems and respiratory problems similar to those related to PM2.5'.

Mr President, while we have looked at PM2.5 we need to remember that the sulphur dioxide and nitrous oxide, NO₂, are precursors to particulate matter or PM2.5 so we need to look at the whole picture, not just one measure within it. It further goes on to say:

'Nationally the pulp and paper industry ranks in the top five industrial sectors for emissions of criteria air contaminants including pm, SOx, NOx, VOC and CO. The contribution of mill emissions to air quality varies from region to region. In addition to health concerns related to these common air contaminants a number of other air pollutants emitted by pulp and paper mills raise health concerns. According to the National Pollutant Release Inventory - NPRI - the pulp and paper sector contributes significantly to total emissions to the area of acetaldehyde chlorine dioxide and hydrogen sulphide. Based on a federal risk assessment done under the CEPA 1999 acetaldehyde was determined to be a toxic due to its characterisation as a carcinogen as a respiratory irritant. Scientific literature on other pollutants such as chlorine dioxide and hydrogen sulphide indicates health effects and these will be taken into account in the current and future risk assessments for these substances.'

Dr Roger Drew of Toxikos, also discusses the issue of PM 2.5 in his expert witness statement prepared for Gunns Limited. I think we would have to agree that ultrafine particles or PM 2.5 is an issue that must be, and is, considered in this permit

I do have some concerns that in the permit, emission guidelines for particulate matter, PM 2.5 and PM 10's monitoring at the various stations other than the Rowella that utilises a tapering element oscillating microbalance, sampling techniques, frequency of sampling, averaging time, analysis technique and reference method, are all yet to be determined and will be 'as approved by the director'.

Whilst I accept that the Director will make a reasoned and informed decision regarding these requirements, I would suggest that these are important on ground measures, that demonstrate what is actually happening where people live and work, as opposed to the in stack measures, should be monitored regularly and frequently, especially over winter.

Whilst in reality, this may well be the case, I ask why would such an important measure not already have an established monitoring program that is clearly defined within the permit before us?

There is also concern in my mind that chlorate and chlorine dioxide levels released from the chlorate plant vent scrubber, the chlorine dioxide plant vent gas scrubber and the bleach plant vent, are to be determined. I would have thought that with potentially dangerous chemicals such as these, emission limits would have already been established.

This may well have resulted due to the fact that Gunns did provide two options for their chemical plant, option one, which was deemed non-compliant by Sweco Pic and option two that represented AMT was deemed compliant. We have been informed that Gunns intend to proceed with option 2 – a decision I believe was made very soon after the release of the Sweco Pic report. However, I would have expected that as this is AMT, the information needed by the Department of Environmental Management, would have been available and therefore emission limits would have been set.

Water Emissions

When considering wastewater emissions, I am sure that almost everyone is aware of the highly toxic pollutants that were pumped into our seas and inland waterways in years gone by, as was also the case with air emissions. Tonnes of harmful and toxic chemicals were released into these waters, I do believe that at the time when this was occurring, there was not anywhere near the knowledge we now have regarding these toxic substances, however, the end result was that many of these waters around the world were heavily polluted as a result, and many remain heavily polluted in the sediments on the ocean, lake or river bottom.

Sydney Harbour is one such example, however this heavy pollution did not occur as a result of any pulp mills discharging effluent into it. The Baltic Sea, however, is one where pulp mills of the past, as well as a number of other heavy industries in Finland and Sweden and other Scandinavian countries, did result in significant contamination to the point that the water and anything that did survive living in the water, was not fit for human consumption.

It must be remembered that Pulp Mills are only one source of dioxins and furans that are released into our environment.

As stated in a paper by William Murray of the Science and Technology Division of the Government of Canada titled 'Pulp and Paper: The Reduction of Toxic Effluents' in 1992,

"PCDDs and PCDFs also are produced during pulp bleaching, where they are formed from chlorinated phenols, and particularly from chlorinated 2-phenoxyphenols. Bleachery effluents account for the release of 5 – 15 grams total PCDD and PCDF congeners per year in Sweden. Accordingly, the Swedish pulp industry is responsible for only a very small amount (1.7%) of the approximately 1 kg of PCDDs and PCDFs released from all sources in that country."

And further

"Similarly, in the United States, it was estimated that in 1990 the pulp and paper industry would be contributing only 1.5% of the approximately 40 kg of total PCDDs and PCDFs released to the environment annually."

A paper written by Brent Herbert-Copley, entitled *To the Limits ... and Beyond? Firm-level responses to regulation in the Canadian Pulp and Paper Industry*, clearly shows enormous improvements in the effluent discharges and pollutants within this effluent over the last two decades. In his report it shows that since 1998 in Canadian pulp and paper mills the levels of dioxins and furans in grams per year has gone from 360 grams per year in 1988 to 2 grams in 1994. Then in 1995 and 1996 they were not measured. As they said, when they get to such low levels they are very difficult to measure unless you have highly specialised equipment. So there has been a huge improvement over the years in the technologies that are used.

There are many papers that have been written that highlight the enormous improvements over the years in this area. A quick look at the Alliance for Environmental Technology website provides a number of references to the improvements made and the ECF process has resulted in reductions in the production

of dioxins and furans to very low levels. My own research and discussions with experts in the pulp and paper industry also confirm this.

Progress should continue with continued improvements in technology and techniques available to and used in pulp and paper making. However, as I stated previously, this comes at a financial cost.

When we hear comments from areas such as these, that yes there was a problem, but now it is much better - we can even swim in the water and eat the fish caught in it, one must consider are these comments being made and recommendations formed from a different starting point that we have here in Tasmania? Going from a really bad picture to a pretty good one, I don't really believe is the same as starting from a really good place and progressing to an acceptable one, but not as good as it was.

I believe this is one of the main reasons there has been great concern from our fisherman and those who use our Northern beaches for recreational activities and appreciate that this part of Bass Strait, whilst it does have a background level of dioxins and other pollutants, as all areas do have due to human activities in the area and by-products of nature itself, this is essentially a pristine environment, that if we add any pollution to this area, it is potentially a backward step.

We were also informed that in some areas such as South America, where raw sewerage has been pumped into a river that has a pulp mill that uses older technology up stream, a new mill to be built on this river will actually assist in cleaning up the river as the new mill will treat the sewerage through its water treatment plant. This mill will therefore certainly provide a net benefit to this area, with a resultant positive residual impact on the river water quality.

In cases such as this, it is hard to argue that this is a positive addition to the area, even though at this particular mill on a river that borders Uruguay and Argentina, there has been significant opposition from the local communities - some of it more political than environmental.

It would also seem from information in the European Commission Integrated Pollution prevention and Control (IPPC), Reference Document on best Available Techniques in the Pulp and Paper Industry, December 2001, the document that these permits and conditions are based on, and other research I have conducted including a Finnish Environment Report of 2007 titled Continuum- Rethinking BAT Emissions of the Pulp and Paper Industry in the European Union, are showing that levels lower than the permit condition limits are being achieved in other mills in Scandinavia and Canada, but again it is difficult to compare if you do not know the exact process of the mills being assessed and whether it is an overall picture. My research has shown that there are mills overseas with lower levels of emissions than some of the ones that we are looking at, but overall we are pretty much in the middle.

We had a report on our seats yesterday that I have not really had a chance to look at, but it looks at where the proposal fits in, the benchmarking of the environmental performance of the Gunns Limited mill in northern Tasmania. It was only done by EKONO on 24 August 2007 and that is probably why I have only just got it, but it does show where the Gunns pulp mill fits in in the big scheme of things. It is certainly low down on the left-hand side of the scale which means that it has probably

performed better than most mills in the majority of areas, but midway in some. Overall this is the mill that should meet the needs of the future.

The Finnish Environment report contains information that levels of AOX for example, from Finnish Mills were reported at yearly averages of 0.14 and 0.16kg/ADt, in 2001 and 2004 respectively, which is only a small difference from the permit levels of 0.2kg/ADt, but as this is where dioxins and furans are recorded, then due to their toxicity, a small difference can potentially have a significant impact.

Other differences can be noted, but I looked more at AOX for the reason that with highly toxic substances, only small differences have the potential to result in significant and harmful impacts. This is especially in light of the fact that there continues internationally debate and investigation of what, if any, level of some of these pollutants is safe.

Even though some of Professor Andrew Wadsley's work, recommendations and figures are being challenged, he did make the comment in a briefing last week, that dioxins from pulp mills are not a problem, as long as you establish and adhere to the correct emission limits. His view of what those limits should be have been disputed by some other commentators, however, due to the highly toxic nature of these pollutants, we cannot be too careful and should really ensure that if this pulp mill proceeds, it only does so through rigorous emission limits.

The permit before us clearly states a much higher level that Prof Wadsley is suggesting, as is the Federal Environment Minister Malcolm Turnbull.

As a signatory to the Stockholm Convention on Persistent Organic Pollutants, we have an international obligation to consider what sources of POP's Australia may contribute to the environment to land, air or water. It is therefore I believe very important that we, in taking this obligation seriously, do what we can to reduce and where possible, eliminate the production and environmental releases of the twelve POP's set out in the Convention Australia entered into and became a party to in August 2004.

Obviously, this should not just include careful scrutiny of a pulp mill proposal, which will produce dioxins and furans, at very small amounts with current technologies used and planned for use in this mill, but any other activity that may result in the production of these or other POP's.

As I previously mentioned, during this debate there have been a number of commentators have had a variety of comments and predictions regarding dioxin and furan levels. The Federal Government have also suggested that the limit in these permits is too high at 13pg TEQ/L and that a limit of 3.4pg TEQ/L should be the limit. Incidentally this is a limit, the proponent has apparently informed the public, that can be achieved. However, we do hear that significantly lower levels to as low as 1 or even 0.55pg TEQ/L is being achieved in Swedish and Canadian mills. This has been difficult to confirm and to compare apples with apples, so to speak, is very difficult especially when dioxins are not monitored in Scandinavia as it is not seen as

an issue. It is also difficult to compare numbers and values when the tonnage of pulp production and the type of timber used, may give different results.

However, the argument has been put that if as we are constantly reminded by the proponent and the Government that this will be a world class mill, operating at the worlds best standards, then one could expect this mill could be expected to meet the lowest limit conditions, that are met in other similar mills, especially as internationally it is still under debate and consideration as to what a safe level actually is. Some would say there is no safe level, others disagree.

This is always a difficult issue as it is often only after much research and the passage of time, especially in cases where adverse impacts may take many years to manifest and may impact more significantly on future generations. I remember, in the not very distant past, I and others informed pregnant women that there appeared to be a 'safe' level of alcohol intake, whilst always encouraging women to err on the side of caution and avoid alcohol during pregnancy, it was believed that the occasional drink was OK. Current research is showing that perhaps this has been wrong advice and that adverse impacts on the foetus may occur even with very low levels of alcohol intake.

It is therefore very important to do all we can to minimise potential harm, especially when we know for a fact that dioxins and furans are extremely toxic in small amounts, especially for unborn babies, infants and young children and at some other times in a person's life.

I do feel somewhat frustrated by comments such as if they were that bad, why don't we all have cancer now or why aren't we all dead! It is quite clear that the adverse effects of these pollutants are accumulative and may take some time to manifest, particularly the negative impacts on human reproduction. However, I think anyone working in the field of reproductive health would be able to clearly state that fertility rates are falling and that there is a growing number of infertile couples seeking reproductive assistance.

The other concern is that these toxins may bio-accumulate on the ocean floor if adequate dispersal does not occur. This will result, over time, in an accumulation in the fish and birds that feed in the area, and as these toxins take many years to breakdown, they remain in the food chain and eventually end up at the top of the food chain on our tables.

I fully appreciate that modern pulp mills do not produce significant levels of dioxins and furans and that there have been significant improvements over the last 20 years, as I have stated, in this area, but in the absence of adequate hydrodynamic modelling, that clearly shows that adequate dispersal will occur, how can we be sure this will not occur? Whilst we have been informed that the hydrodynamic modelling will only require 'fine tuning', we certainly cannot pre-empt the results. As the Director of Environmental Management, Warren Jones said, he doesn't have a perfect crystal ball - unfortunately, I don't have a crystal ball at all.

Management Plans

I appreciate that management plans including plans that deal with emergency response, accidental spills, hazard management and others are often not developed this early in the process, but I do have some concerns about the number of plans that are required at crucial points and the need to ensure that these are adequate.

I do ask however, why some of the important management plans are not in place before we have got to this point? This is particularly with regard to accidental spills, which could occur during construction as well as operation,

Economics

I am not an economist at all - in fact I prefer to steer away from economics as much as I can - but I would like to make a few brief comments with regard to this. We have had a number of briefings about the economics of this pulp mill and again we have had quite opposing views in this area as well so it is not just scientists, it is economists too who cannot seem to agree. It depends on where you start from sometimes. One big project such as this would be perhaps quite vulnerable to the exchange rates and commodity prices. It is a bit like putting all your eggs into one basket so that if there is a significant downturn in pulp prices or the dollar changes - we were talking at one stage about price parity with the US dollar or value parity. I think if that actually happened it could threaten this project.

The other issue is that new technologies continue to emerge in the pulp and paper industry and we have seen this very clearly in the last 10 to 20 years. There will be an expectation and I would suggest a requirement that the proponent be required to install these new technologies as they come online and they are proven to be effective. The only problem with many of these new technologies is that they are usually available at significant cost so if this requirement is imposed, will it result in a project potentially becoming unviable in the future? We do not have a crystal ball. I think that it bears consideration. Whilst clearly this is an issue for the company to consider more than us, it is a matter I believe that should form part of this debate and our decision making. I, and I suspect other Tasmanians, would expect this constant upgrading of technology and further reduction in emissions as part of the project and it should be part of this approval permit in a number of areas.

I stated previously that continued economic growth is vitally important to this State and we must do all we can to encourage development and investment in Tasmania to ensure we can continue to see economic growth in this State. I note that the Treasurer expects 3% economic growth this financial year without a pulp mill and 3.5% with one. One could suggest from this that he is not expecting a downturn, even if the pulp mill doesn't go ahead.

As far as the issue of investor confidence goes, I believe there is more than one way this could go whether or not this project is given the approval of Parliament.

If this project goes ahead, I do not necessarily think that all the potential investors and developers out there will suddenly say - YES, Tasmania is open for business. I believe that if they have watched this whole sorry process, they may be more inclined to think that our planning and approval process are such a mess, just look at the Pulp Mill process - do we really want to put ourselves through that??

Clearly we need to have a good hard look at the RPDC and other approval processes to ensure that they can actually provide an independent, effective, efficient and rigorous assessment process that will achieve an outcome for a developer in a timely manner.

Alternatively, if this pulp mill is not approved and therefore not built, I do not necessarily believe that potential investors will say or think, Well that's it, Tasmania is closed for business because it was all too hard for this particular proponent. I think they may well look at it in a way that says, well clearly Tasmania has high standards and we need to be sure that when we go with a DA we have all the relevant information. However, this will only be the case if we can ensure that the assessment process is independent, effective, efficient and rigorous and can deliver an outcome in a timely manner.

Another issue that has been raised by a number of economists and employers is the potential for significant upwards pressure on wages in light of the current skilled worker shortage. The adverse impact on other business and industry, current and emerging, expanding or ready for start-up is a real and important issue. One some advocates for this mill have not really considered or factored into their calculations with regard to economic benefit.

The fact that this has been overlooked is a real effect of the lack of an integrated assessment process and the complete absence of a social and economic benefit and risk analysis. These important considerations would have been considered with such an approach.

Sweco Pic Report

Report basically stated that the proposal could proceed to Parliament for consideration - even though it did not meet all emission guidelines. There has been argument whether this should or should not have been the outcome of this assessment, however, I did see this somewhat as an effective handball to the regulators or relevant persons and the Parliament to do the work that hadn't been done.

Effectively, it then fell to the regulatory bodies to prepare permits and conditions to ensure that the emission guidelines could be met.

I and many other Members of Parliament stated that a pulp mill should be supported if it meets the rigorous and high standards of the emission guidelines that were prepared through the RPDC process. That is now our challenge.

Other industries

When we consider the impact on other industry in the region, a number of these industry representatives and individuals have made representations to all members during this process.

It must be stated that the proposed pulp mill, if built, will be built in an existing industrial area and as such is not an unreasonable proposal. However the fact that there are other industries in this area that do produce emissions and pollutants into the environment, I don't believe is a reason to say that that makes it all okay. Any new development regardless of the size, pollution potential or other aspect must be assessed against the current requirements and only approved if the residual impacts are acceptable.

If another industry is producing more pollutants than this mill will, I don't believe this is reason or excuse for rejecting or supporting this pulp mill. What we are being called on to decide is whether this pulp mill should proceed under the conditions and permit before us.

If other industry in the area needs to tighten up their act then that is a separate issue. An issue that will hopefully be addressed through the establishment of the much anticipated and often promised independent Environmental Protection Agency. I fully support the establishment of an independent and inclusive EPA, an agency with teeth that will act in this area without fear or favour.

However, even though this has been promised and we should see the establishment of and EPA debated in this place before the end of the year, we really don't know what it will look like and if agreement can be reached on all matters of concern. It is certainly far from a done deal at this stage.

I therefore find that I need to make my decision here in that knowledge and fully consider how the EPA will work when we have the opportunity to see how it will look and function. The Leader may have more to say on this in his reply to reassure me.

Other co-existing industries, that have established and grown in the Tamar Valley over many years have raised concerns, some based on their understanding of problems associated with old pulp mills, some based on the recent experiences of the same industries in other parts of the world that co-exist with modern pulp mills. The concerns that have been raised by the tourism operators, the wine makers, the agricultural businesses including other fruits and berries, seafood, meat and other produce are not unreasonable.

Unfortunately it would appear that the Government and the proponent have been somewhat slow to react to these concerns and this has not enhanced the relationships or worked effectively to allay concerns. When people have invested significantly financially and emotionally in their business venture, and fear that their profitability and even their viability may be under threat, it is not unreasonable to expect these people are engaged early and issues identified and serious consideration to their concerns is given.

Labelling some of these people, who may well be responding out of fear, as misguided or uninformed is less than helpful.

To illustrate that point I wish to quote from just one of the thousands of emails and letters I received as other members also did. This is a randomly selected letter that I received this week – as the Member for Rosevears discussed there are many well

considered and genuine people out there from all walks of life who are concerned and have not had the benefit of the hours and hours of briefings, or the opportunity to visit overseas mills as I did.

This is from Mr. Bill Kearney who lives at Riverside, in the member for Rosevear's electorate. He starts off making a comment about the overseas fact-finding tour:

'You no doubt now will be more aware that local opposition to the proposed mill stems from genuine concerns about perceived detrimental effects on the environment and lifestyle amenities we in the Tamar Valley now experience. Although far from perfect, there is no excuse for adding to whatever shortcomings that may already exist. Hopefully you and other MLCs will realise that the majority of us who oppose a pulp mill at Long Reach are not just misguided opponents of everything developmental, indeed, it is foolish in the extreme for those in favour of the mill to brand people with genuine concerns as anti-development or anti-everything as the Premier tends to do.'

That is a handwritten letter, Mr President. I do not often get handwritten letters but I have got a few. I think it takes more effort to write a handwritten letter than it does to do it on a computer, spit out 10 and send them off, or press the button on your e-mail. It is very easy, as we have noticed over the last week.

It may only take one tainted fish, abalone, scallop or even wine shipment from this part of Tasmania to taint and seriously damage the entire export market. I know that sounds dramatic, but the export market doesn't see Tasmania as a big place with more than one area of significant size that the fish, wine or other produce may come from.

Mr President, it is interesting to note that on the overseas trip to Chile, the Nuvea Aldea mill was originally to be called the Itata Mill - or something similar as it is in the Itata Valley, however the existing winemakers of the region requested that the name be changed as the wine industry was promoted as from the Itata region and they felt that this may threaten the image and 'brand' for want of a better word of this important industry. The company obliged and hence the mill is called the Nuvea Aldea Mill. This does highlight the perceptions around these two industries and how seriously it is taken by both.

I accept the concerns of these other industries and businesses are genuine and feel that many of their concerns would be addressed through this permit. It is some of the unknowns that are still causing concern. Some of these will not be able to be fully addressed until for example, further hydrodynamic modelling is done and baseline data is collected to ensure adverse impacts can be identified early.

Transport

A briefing from DEIR reassured us that our major highways including the Bass and Midlands Highway could easily cope with the extra 95 and 90 truck movements a day respectively, that this proposal would result in. However, if the preferred rail option, preferred by the proponent and the Government, this would see a significant reduction on these roads.

We were also informed that the push for the rail upgrade was not reliant on the success of this proposal - funding will be sought under Auslink funding regardless of the outcome of this debate. This was very welcome news indeed.

What was not acknowledged or really considered in this briefing was that whilst there may not be a significant increase in log truck movements from the North East as a result of this mill, there will continue to be a high number of log trucks on the roads in this area, roads that struggle to cope with the traffic at the moment, especially for the trucks who use the narrow and windy roads that makes it almost impossible for them to drive without crossing double white lines at times.

This is also a problem with log cartage from the West Coast - it is certainly no fault of the truck drivers, simply the roads are not designed for this type of traffic. Another issue that appears to have been overlooked in the assessment process, is that there are many main roads in the North East where this is also an issue and with the increase in general traffic with the extra thousands of people who will be in the region during construction, I can fully understand the locals concerns and the concerns of the Member for Apsley and Rosevears, who I am sure have had many representations, as we all have from concerns residents and tourism operators. They may take some comfort in the Leaders comments in his speech, with regard to some commitments to, or at least recognition of, the need to spend considerable money to upgrade roads that need attention – whether or not this pulp mill goes ahead. I guess the proof will be in the pudding. I am sure that the Member for Apsley will have something to say in her contribution to this debate.

One other aspect of transport that I do not believe has been considered also is the trucking of pulp to the Burnie Paper Mill - I am not sure how many trucks this would be, however if the rail option is successful, it may not add any trucks to the roads.

Health

The health of all Tasmanians is of utmost importance and concern to all. In briefings provided by the Department of Health and Human Services, we were informed that the permit as prepared is and I quote "likely to provide for protection of public health". The term 'likely to provide' does not give a great degree of confidence as we seem to be hearing those terms, likely or unlikely, in relation to a number of particularly health related issues.

Any threat to public health must be taken seriously and I am sure that this is the case. The concerns expressed by health professionals and the AMA should not go unheeded, but it should always be remembered that reason can be cast aside when fear overtakes the debate.

This is why we must base decisions and discussions related to health need to be based on evidence and science. This also presents its own challenges as the rigor of scientific investigation usually requires isolation of issues to eliminate potential confounders. Thus the large number of potential health and safety issues, which frequently interact in real life, can become so dislocated from each other in the research literature as to be almost unrecognisable as a whole conglomerate.

This makes the synthesis of the research a huge task. The application of that research to local situations and populations is yet another complex task. Rushing such tasks merely overlooks, blurs or minimises risks, rather than recognising, quantifying them and discovering whether adequate and desirable strategies to deal with them currently exist.

In the area of research into health impacts of pulp mills, there have been some overall reviews performed. However, due to the extensive nature of these they are published as books or stand-alone documents, rather than in a scientific journal, where there is simply not space to deal with the complexity of the numerous issues. This reduces their on-line accessibility, but I have had some assistance from those in the medical profession to review as much as possible in a short time, the current research. The research that was reviewed is mostly from the 1990's and up to 2004, which is therefore current research.

Much of this research has been conducted on pulp mill workers, whose health is just as important, if not more so, as they are potentially exposed to pollutants on a daily basis and potentially at higher levels, than those who live near the mill, but at some distance away.

The literature, according to this review suggests that:

Pulp mills' numerous inherent major health risks have been increasingly recognised over recent years. A number of the risks are geographically affected, thus each potential location for a mill is different from others.

This has generated enormous public concern worldwide, now a recognised phenomenon of extensive social discontent.

The public concern has generated progress in technology, which has provided options that reduce some of the risks to the public, but increased the complexity of the processes, expense of monitoring, and (to achieve zero discharge), potential increases in risk to workers.

Industry has been recognised to have incentive to bypass several of these measures to the detriment of public health.

Governments in several nations have been recognised to have little incentive to perform the difficult and unpopular (to industry) task of regulation.

Thus even while technology exists to reduce risks to humans and environment, they are often not used or adequately regulated.

Gaps still exist in important areas of the literature.

The concerns of the public regarding the location of the proposed pulp mill in the Tamar Valley are supported in this information as the topography of the area, the climatic and meteorological aspects including the well known inversion layer, do present challenges that may not exist in mills in other parts of the world.

This was borne out in my investigations attempting to locate other mills that are located in similar locations as the Tamar Valley. They are certainly few and far between. Therefore it is difficult to equate research outcomes to this proposed mill for the reasons I have stated, particularly with regard to the impact on health of air

emissions. This remains the case even in light of the recent advances in pulp mill technologies that would be employed at this mill.

ITS Global, who have the task of conducting a social and economic benefit analysis, did have a cursory look at impacts on health services in this region. If we were assessing benefits of this proposal, as was their task, there are very few, if any, benefits in health terms if this development were to go ahead. The ITS Global report does show the negative impacts to health services, particularly in the construction phase. It is a qualitative report rather than a quantitative report so you are looking at commentary rather than numbers. We see that the impacts on demand for health services, such as GPs, specialists, optical, physiotherapy et cetera, on a regional level during operation is negative, but they consider it not significant. On the local area it is negative, but the significance of impact is low. They are not saying it is not significant, it is just low.

We are looking at an area in Launceston that is struggling with its health services at the moment, if you are to believe the local paper and the other members who represent the area. If you look at their comments in relation to the construction phase at the same measures - increased demand for health services, GPs, specialists and the like - on a regional level they say the impact is negative with a low significance, but on the local area it is negative with a moderate significance. If we look at increased demand for emergency and medical support services - hospital and emergency care, ambulance and SES - on a regional level it is negative, but of low significance. They are all negative in these important areas that people rely on.

If we look at increased demand for other social services, such as mental health, crisis counselling, emergency housing services, legal services, aged care, child care and family care, they are considered negative and significance is low. But if you are the person with the mental health problem, it can be quite big to you. It might be low overall, but the individuals out there needing the support and help would perhaps disagree with that.

When I say this is a cursory glance at the impacts on the health services in the region, I want to quote from the ITS Global report again. Looking at regional impacts it says here:

'Launceston will be the focal point of the regional impacts. Services currently available' -

and this is under health again -

'that may be affected include' -

I will not read all the dot points but the two of note here are:

'A 300 bed, 24-hour public hospital with emergency service facilities and two private hospitals (bed capacity unknown).'

Mr President, I would have thought if you are undertaking a report of this nature to really look at what is important and what we need to consider in doing an analysis you would ring up the hospitals and say, 'How many beds have you?' Surely that is important if you are going to bring 1 000 workers into the area.

The next point is:

'Ambulance services with full-time paramedics, resources unknown.

Medical centres and a large number of GPs, resources unknown.'

One call to the Division of General Practice would have given those numbers. So on just that point alone it is inadequate.

It is not evident that the increased costs associated with these negative impacts on health have been considered either and, as I said, it has not been any more than a brief

cursory glance. To really do a proper analysis you would need to factor in the increased costs associated with the negative impacts of health that are identified in the report. They are not denied. It says that there will be negative impacts but there is nothing that tells me they have considered the cost of this or what we need to do about this.

Capacity of Regulatory Bodies

These permits and conditions were provided by the relevant persons or the regulatory bodies, after considering the consultant's report, in what has been confirmed by some as being an almost impossible time frame. I am sure many of these relevant people have been working day and night to achieve this point.

During briefings from the various departments, we were advised that the permit itself is not a statutory document as the regulatory bodies were limited to preparing conditions and permits related to the project, under the relevant Acts, that they would have done under normal approval processes.

The capacity to make recommendations beyond that under this process did not exist. The power to recommend did exist under the RPDC assessment process.

As there is no requirement for any other information to be presented to Parliament other than the permit which contains the conditions, relating to the relevant act, I must say that I have appreciated the extensive briefings we have had over the last week many provided by these relevant people. The department representatives have been very informative and willing to answer any questions and have been quite patient and generous with their time, following-up on issues of concern and returning at a later time if necessary.

It did raise the question on a number of occasions about resourcing within and the capacity of these bodies to meet the task ahead should this project received the required approval this week. It was stated that some departments would be required to put on extra staff, during the construction as well as the commissioning and operational phase.

Mr President, this process has already had a negative impact on some departments during this process in that due to the enormous workload that has been thrust on these regulatory bodies, other routine tasks have been set aside and delayed as a result. Mr President, I would be the first to agree that the workload for these regulators has been a massive task and that from here on, the demands will no doubt be much less.

However, I do not believe it is reasonable that one project should chew up all the departments' resources to the detriment of others in the community who need the services of various departments. Even if it may seem to us that the only thing that has been going on is a pulp mill proposal, but life does go on in rural Tasmania, dams need to be built at a time when dairy prices are up and farmers are in a position to invest in infrastructure to assist in drought proofing their farms.

Many have had to just wait until this process is over, as there has been no capacity within the department to process a dam application. I raise this to highlight the fact that the Departments certainly do not appear to have extra capacity and I would like

some assurance I guess that the ongoing monitoring of the operations of the mill if it proceeds, will be accommodated either within existing allocations or through appropriate increases in resources, human and otherwise, where necessary.

I guess the question is, will other projects, applications, monitoring or approvals to name a few be delayed if departmental officers are tied up dealing with these possible events, such as we have seen over recent months, obviously to a lesser degree?

Of course an increase in resources within Government Departments comes at a cost to the tax payer, and members of the public have rightly asked, should this extra cost be met by the proponent.

I believe this could be considered in a couple of ways, if the proponent was to finance the extra requirements of the regulatory bodies, would the work done be seen as independent of the proponent, remembering that perceptions and reality are often not the same but can perceptions can become reality in the minds of observers.

This was one of the big issues in Chile where the Company funded much of the testing and compliance audits, or they provided a list of auditors' names from which the Government could select an 'independent' auditor. Even though much, if not all of this work was undertaken by independent people or organisations, the perception in the community was quite different and did not enhance the Company's relationship with the community.

One of the conditions in this permit is to establish a Community consultation and communication strategy. I would hope that this would include establishing a community representative group who advise the company on matters of concern. This is not specified in the permit itself but is a very important aspect of community wellbeing, identified by the Director of Public Health, Dr Roscoe Taylor.

This is also an important step in taking the community with you but if there is a lack of trust due to a perceived lack of independence and transparency in some of the regulatory functions, this will be a huge challenge. Therefore it may be reasonable that extra resourcing required by the regulatory bodies and EPA when established should be met by the tax payer.

The issue of sanctions for non-compliance is another area of concern to many. The sanctions and penalties can only be imposed as per the relevant Act. Some of the penalties that can be imposed under these relevant Acts do not come with very significant sanctions in monetary terms and in situations that attract higher sanctions, proving malicious intent or negligence can often be very difficult and use of common law options can also be challenging for individuals.

Therefore these sanctions and penalties seem insignificant in my mind and many others, and unlikely to significantly impact on the Company financially, unless there are many such breaches. I appreciate that this is not part of the permit conditions, which are limited relevant acts governing the construction and operation of this project, but I do believe that this issue should be noted and considered and perhaps the Leader may share his thoughts on this issue in his summing up.

The issue of the ability of enforcing the permit has been raised by concerned members of the public and other members. I do not doubt that the regulators will act appropriately, particularly the Director of Environmental Management, who operates at a level above ministerial influence.

However, I would just like to quote from an email I received concerning this matter, as I do believe these views are legitimate and based on personal experience.

This is an e-mail that I received from John Ryan who is an electrical engineer. He has vast experience particularly in power, oil and gas nationally and internationally and he also has some experience in pulp mills. His major concern was that new industries, whatever they are, whether they be gas, oil or power that is worked in or pulp mills that he has also worked in are not usually a problem. It is when they start getting on in years and the maintenance becomes an issue and a costly part of the operation.

I will read from his letter:

'I am a professional electrical engineer with over 40 years' experience in a wide variety of industries concerning paper mills. This experience has shown me firsthand that where there is any conflict whatsoever between production and therefore profit and respect for the environment there is no decision to be made in the minds of company management. It is always profit at any cost.

Operating permit conditions and the ineffectual policing of them with no more than token punishments mean nothing to CEOs of companies.'

I am not saying that that is my opinion, I am saying that that is this man's opinion. He has worked in the field, he has been in the area so I believe he is just highlighting - and I did talk to this gentleman after he sent the letter - the concerns he has that you can have really good regulations and a good regulatory body but decisions need to be made regarding whether we spend this money to protect the environment or could we get away without it. You tend to take that path.

I also received an email from an occupational health and safety assessor - which I couldn't find to quote from when I went to search for it among the thousands! The writer who had had many years experience in this area raised concerns facing the challenges she had faced when undertaking site assessments

Conclusion

Before summing up, Mr President, I would like to comment briefly on the document tabled by the member for Rosevears yesterday that was prepared by Miotti Consulting. As I said, it was as late as yesterday and we are still getting documents as long as this.

This is an independent assessment that was prepared for the independent members of the Legislative Council - 'Peer Review of the SWECO PIC report with particular regard to the identified non-compliance with the Tasmanian guidelines'. Both the members for Elwick and Rosevears gave a good overview of Roberto Miotti's credentials and capacity to comment on the SWECO PIC assessment and also his intimate knowledge of the emission guidelines. I will not try to redo that because I do not have anywhere near the information that they do about that.

I certainly have not had time to study this report in any detail but I want to comment on some of the findings. It is set out in a fairly easy to read way. I think that member for Elwick touched on some of these in his contribution, but there are a number of areas that have not had permit conditions attached. I would imagine, because of his earlier involvement in the RPDC process, that this man would have the capacity to make an assessment such as this.

When we get back to he said, she said and no one can agree, it does make it difficult, but I am willing to take this man at his word in this regard.

Accepted modern technology to control emissions to the atmosphere and marine environment and the land will be mandatory. This is D 1.1.1 in the SWECO report and this was not assessed at all. That is one of the areas that I raised about the accepted modern technology to control emissions that has not really been looked at. Accepted modern technology for the reduction of emissions to the atmosphere, total reduced sulphur or TRS spot monitoring program, and his comment was 'not assessed by SWECO because the documentation required for this assessment is yet to be finalised by the proponent'. There are some of his points that were perhaps not relevant in my mind, but I am not an expert in the field as this man is.

In D 1.1.4 table 2 is stated the guideline requirements AMT for the reduction of emissions to the atmosphere, nitrogen oxides - NO_x - and the power boiler. He does talk in this area about some of the new technologies, one being selective non-catalytic reduction. From my research and representation from a number of people, this is something that is out there that is perhaps not quite refined but it is something that seems to be the way of the future and it does not seem to be being considered through the permits and conditions that I have looked at. Again we have only had five days to digest this, seven by the time you count the weekend. Some of those issues may have been covered off in some other conditions within the guidelines.

In table D 1.9 table 4 the guideline required was AMT for the reduction of emissions to the marine environment, chemical recovery and handling of accidental discharges, spills, leakages and releases of processed liquids and solids. The comment he makes is this. can the permit conditions resolve this? Yes, the proponent should implement these plans and procedures before the start-up of the mill. This is where I was saying that some of these management plans need to be in place really early on because it is not just spills and leakages of chemicals you are using at the time of production; potentially during construction you have other harmful substances too.

There are some areas there that have not really been covered off. There are some that I do not think are particularly relevant, but that is me. We then go to the hydrodynamic studies and hydrodynamic modelling in D3.14. This section of Tasmanian guidelines states that it is expected that the studies will require the use of hydrodynamic modelling and appropriate wind, current and water density measurements to determine the effluent dispersion characteristics under a variety of weather conditions and allow for seasonal variability. He has said that yes, it can be met with permit conditions. It has been mentioned in the permit, but the timing of all this is such that, if is not in place now, how can we be sure that we are on the right track here? It is of little comfort to have the mill substantially built and then find these problems later.

There are other things in the body of the document that spell those out more broadly, but I will not go right into that.

Mr President, in Conclusion, this assessment process we now find ourselves in, is for both the proponent and the Government, a very high risk process. We can only accept or reject the permit before us. If I, and I expect others, are not satisfied that all the issues of importance have been covered off adequately and completely, then the permit must be rejected. There is no other option.

My visit to pulp mills overseas did demonstrate that modern pulp mills have come a very long way from the polluting mills of the past. Different bleaching and other processes have significantly reduced the emission of pollutants, including the most toxic substances, dioxins and furans, into our environment. The issue of monitoring of, and potential impacts of ultra-fine particulates or M 2.5's, is now being recognised and monitored and we await the establishment of an International standard for emission limits, rather than the advisory limit we now see.

Unfortunately, this current assessment process is more narrow and has not been an integrated process, and this has resulted in some aspects that would have received attention under the RPDC assessment, not receiving full consideration. I also believe that under the RPDC process, which unfortunately could not meet the timeframes demanded by the proponent, we would not be facing the absence of some vital assessments.

Of those issues that I and others have identified, one in particular is the issue of the inadequacy of the hydrodynamic modelling that has been identified by almost every assessment process even under this new process, and even remains concern that the current permit before us may be inadequate.

Another is the issue of wastewater dioxin and furan emission limits as I discussed previously, particularly related to the issue of bioaccumulation as I am well aware that modern pulp mills utilising modern bleaching technologies, result in very low levels of dioxin and furan production and wastewater treatments also see much improved technology for removal of these substances through the filtering of suspended solids and organic matter, to which these toxins cling. However, the inadequacy of the hydrodynamic modelling does not provide me with the comfort I need at this stage, even the Director of Environmental Management stated in a briefing that it would be good to have had this modelling done to a point that could provide these answers before we got to this point.

I appreciate that the conditions do require further modelling to be undertaken, however there are some concerns that what is proposed in these permits and conditions may not provide the necessary data to fully assess this body of water. I also believe that this information should have been available before this important decision is made and approval given. More time to consider this may have revealed some definitive details.

The lack of management plans in a number of key areas is also a concern, and whilst the permit does require these to be developed during the process, I would have

expected to see a number of these readily available prior to approval being granted, particularly surrounding mill operation and safety.

With regard to the atmospheric emissions from the chlorate plant vent gas scrubber, chlorine dioxide plant vent scrubber and the bleach plant vent, the director of the Department of Environmental Management, stated that these emission limits could not be established or determined at this stage as the Department doesn't have enough information about the final processes of the chemical plant.

Combined with the comments I have just mentioned with regard to the report prepared by Miotti Consulting, for me there are a number of issues that could and should have been addressed more fully.

I do also have concerns that transport issues have not been adequately addressed in my mind, certainly not through the permit before us and issues of concern to the winegrowers in the region and many tourism operators and primary producers may not be addressed adequately through this process as a result of these issues I have outlined. These issues are most likely a result of the nature of this assessment process which we are now dealing with, a process I must admit I supported some months ago.

I hope the Leader may have some information and assurances regarding these issues in his reply, regardless of the outcome of this debate, as I will certainly accept the consensus view of this House.

As I have stated I have sought advice from many experts in the field during the course of this process. These experts have come from a wide range of backgrounds some very pro pulp mill and some very opposed. Many of the experts I have consulted have had no particular bias or view, or any direct interest in the project but they do have significant knowledge in the area. I have listened to all of them. Some will agree with my decision, some will not. Members of the public are in the same situation - there will be those who think I have made the right decision and there will be those who disagree.

My only hope in this process is that whether people agree or disagree with my decision, they will acknowledge that my decision was not made lightly and that, as I hope is evidenced in my contribution today, they will appreciate the lengths of enquiry I have gone to reach my decision.

This has been a highly emotive debate that has gone on for some time. As I stated there will be people from both sides of the debate that may disagree or agree with aspects of my contribution and indeed my decision, however this decision has not been made lightly. My decision has been extensively researched and considered and has not been based on emotion, rather it has been based on scientific research and the considered opinions of a variety of experts in the field.

Mr President, in making my decision, there is no question in my mind that we are considering state of the art technology in this proposal and that this project is based on an accurate scientific basis. I would be happy to support this motion, if I could be convinced that the permit before us, fully addresses the issues that I have identified and as I only have one option here I must decide to either accept or reject.

On balance, in spite of what would seem to be the strictest operating conditions for any development or industry in this State, I do believe there are a number of outstanding and critical issues that have not been adequately addressed, these I have discussed.

In the long journey it has been, getting to the place, I acknowledge that had these issues been adequately addressed, I may well be making a different decision and therefore, in the absence of any new and compelling arguments that other Members or the Leader may have in his reply, I will not be supporting the motion.