



Coastwatchers

Eurobodalla's - Voice for Nature

13 May 2020

council@begavalley.nsw.gov.au

Bega Valley Council

Dear Bega Council

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

Coastwatchers' Association Incorporated objects to the Timber Optimisation Hub on the following basis.

- The new saw mill, palette mill and briquette plant being considered for the premises of the woodchip mill plant will result in it having a monopoly over all trees felled in the Eden Region (as well as the bulk of trees logged in Eurobodalla and Shoalhaven).
- The losses of the native forest sector are directly subsidised by the softwood plantation sector and the state government so is not a viable industry. (23 Mar 2020 [Forestry Corp to get \\$46m for recovery](#))
(March 2016 The Australia Institute [Money Doesn't Grow on Trees Report](#))
(13 April [Ending logging in Victoria now would save taxpayers \\$192m, budget office estimates](#) The Guardian)
- The native forest sector has been subject to prosecution by the EPA for breaches such as reported in the Bega News on 27 April 2020 ([Forestry Corporation fined \\$30k for alleged offences in Tantawangalo forest](#)).
- The Bega Valley Council ratepayers also subsidise the native forest sector with damage to local dirt and sealed roads due to heavy machinery and logging trucks. Council also does not receive rates for native forest logging as council's would for plantation timber production on purchased land.

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- The native forest industry will be phased out as the transition to plantations is completed. These mills and plant will then become a stranded asset as community concerns about the use of non FSC native forest wood and the need to retain high carbon locking native forests are fully realised.
- Native forests can provide a return to the NSW government if left standing and made eligible under the Federal Government's Climate Solutions Fund.
(March 2016 The Australia Institute [Money Doesn't Grow on Trees Report](#)
Feb 2020 The Australia Institute [The opportunity for Australia's native forests](#))
- Using native forest wood for short shelf life products of woodchips, pallets and briquettes
 - releases locked in carbon as emissions which contributes to temperature increases (global warming) directly increasing fire risk to the local community.
 - creates a demand for native forest wood to be used for low value products so the name Timber Optimisation Hub is misleading. The industry claims to use waste for woodchips etc but these low value products are the main use of native forest wood.
- Logging native forests dries forest out and adds up to 450 tonnes per hectare of fuel load (from whole treetops) to the forest floor directly increasing fire risk to nearby residents, community and visitors threatening the tourism industry.
(29 Jan 2020 David Lindenmayer [Post-bushfire logging makes a bad situation even worse, but the industry is ignoring the science](#))
(9 Jan 2020 Lindenmayer and Zylstra reply to AFPA and CFMMEU [Scientists warn Forest Industry Plan could Increase Fire Risk SMH](#))
- The opening of a briquette plant will see a major commercial operation in Australia using native forest for biomass for a low value product sold for heaters. Scientific evidence indicates that wood-fired power is more carbon emissive than coal, and especially so for Australia's very carbon dense native forest wood. This goes against the Bega Valley Council signing the Climate Emergency.
- Native Forests sustain wildlife and most native forest has been burnt so existing trees need to remain for current and future hollow bearing dependent species.
(2 March 2020 [Logging is due to start in fire-ravaged forests this week. It's the last thing our wildlife needs](#)) ([Loss of Hollow Bearing Trees a key threatening process](#))

Yours sincerely

Joslyn

Joslyn van der Moolen - Secretary for Coastwatchers
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The Association aims to protect the local environment and preserve the integrity of the ecological systems of the South Coast of NSW. It opposes the unnecessary destruction and degradation of natural systems, unbalanced development and pollution and threats to the survival of plant and animal species and communities.

Appendix A:

Coastwatchers also support SERCA's points as follows:

This objection is to the new pallet mill, briquette plant and processing of sawlogs into laminated and other unspecified products, as well as the woodchips it is already producing.

Eden chipmill owner, Allied Natural Wood Exports has applied to the Bega Valley Shire Council for approval to build a new sawmill, a new pallet plant and a new briquette plant.

Submission to Bega Valley Shire Council

1. This Development Application is not just about approval for 3 colorbond sheds.

It is about providing the means for the woodchipping industry to tighten its grip on the forests of the entire South Coast and East Gippsland. The development will make this one of the biggest native forest sawmills in Australia, processing 60,000 m³/a. Ninety six percent of hardwood sawmills in Australia are less than 45000 m³/a throughput. - [ABARES 2019](#)). In addition to this, it would continue to produce typically over 600,000 tonnes of woodchips a year.

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

If Allied Natural Wood Exports (ANWE) gets this project approved, it gets contractual entitlement to every single tree cut down from State Forests in the region. Indeed, it is a condition of the new Wood Supply Agreement, commencing 1 January 2020, between ANWE and the Forestry Corporation that it meets certain milestones in building this new facility.

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

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

The Wood Supply Agreement, which requires the approval of this DA, will lock in the use of native forest wood for at least another decade, with 5 yearly extensions after that.

4. The footprint of this new mill will extend far beyond the chipmill fence, even the 240 volt electric fence that surrounds the chipmill.

The DA aims to restrict consideration of vital environmental issues to the 3.5 ha of Lot 16/DP1066187, rather than the whole area in which impacts will be felt. Elsewhere in the DA, in its various assessments of air quality, noise impacts, water resources and quality and

motor vehicle traffic there are no geographic limits to the consideration of impacts, provided there is a direct connection. A sound decision must assess direct impacts throughout the supply zone.

5. Bushfire impacts have been ignored.

The DA, especially the report “Biodiversity and EPBC Act Protected Matters Report” ignores the impacts of the summer bushfires on forests intended to supply the mill. It was written before the fires, but no meaningful changes were made to reflect the damage done. In the summer bushfires, 80 percent of the forests available for logging were burnt. An estimated one billion animals were killed. The forests of the region were already overlogged and there are serious doubts about whether the forests can supply enough resource to make the industry viable.

6. Climate issues have been ignored

The Bega Valley Shire has declared a climate emergency and has a Climate Resilience Strategy. This DA makes 2 trivial references to climate, one of them dismissing it as a matter to be considered, because the project is not residential. This raises ethical and possibly legal issues around approval of the DA.

7. Approving the DA will slash direct job numbers in sawmilling from 55 to 20.

In 2019 Blue Ridge Hardwoods, with 55 employees lost the Eden sawlog Wood Supply Agreement to ANWE and is now in the process of closing. ANWE will employ 20, according to the DA.