Help stop the Eden woodchip pellet plant

Points to make in your submission

Bega Valley Shire Council DA2011.35 Lot 16 DP 1066187. Submissions due 24th February 2011

South East Fibre Exports (SEFE) wants to build a wood pellet plant using native forest wood at the Eden chipmill. The Bega Valley Shire Council will soon consider SEFE's proposal.

A. General

1. While this proposed plant is small, it can easily expand. Remember, when woodchipping was first proposed for Eden, it was to be 5,000 tonnes a year for just 5 years. It is now over a million tonnes every year.
2. The material to be used for the pellets is not "waste" and would not exist if one million tonnes of trees (almost 19,000 hectares of forest) were not logged each year to supply the chipmill.
3. The existing use of the proposed material to be made into pellets generates substantially less greenhouse gas than the proposed pellets because, as mulch, it decomposes slowly and transfers significant carbon to the soil.
4. While acknowledging that some particulate emissions will be produced (3.2.1) the Statement of Environmental Effects makes no effort to identify or quantify these.
5. Bega Valley Shire Council Zoning. The chipmill site is currently zoned 1(A) agricultural, arguably not appropriate for this type of development.
6. Noise. Impacts are not examined; simply dismissed as "indistinguishable from background noise," (3.3.1) even though the plant will be run in the afternoon and night shifts when other noise levels are lower.
7. It will take more than painting the shed green to make this a truly sustainable project (Q.6)

B. If you care about the natural environment/ climate change

1. Wood that will end up being used in pellets will be stored a few meters from the ocean where it will be contaminated by salt, increasing dioxin levels when it is burned as pellets.
2. A Canadian study commissioned the government of British Columbia (Canada) in 2009 "Emissions from Wood-Fired Combustion Equipment". The same findings would apply to pellets which are virtually identical in their chemical composition. http://www.env.gov.bc.ca/epd/industrial/pulp_paper_lumber/pdf/emissions_report_08.pdf found that basic emissions which could be expected include:
   Acetaldehyde Alpha-pinene Beta-pinene Carbon monoxide (CO) Formaldehyde Methanol Naphthalene Toluene Total phenols Turpentine 2,3,7,8 Tetrachlorodibenzo-p-dioxin (TCDD) C/P 2,3,7,8-Tetrachlorodibenzo-p-furan C/ Hydrogen sulphide C/S Nitrogen oxides (NOx) Beryllium Cadmium and compounds Chromium (II) compounds, as Cr Chromium (III) compounds, Cr Chromium (metal) Chromium (total) Chromium, hexavalent metal and compounds Cobalt as Co metal Dust and fume Cobalt carbonyl as Co Copper, Dusts and mists, as Cu3 Copper, Fume Iron Lead arsenate, as Pb3 (A2O4) Lead chromate, as Cr Lead compounds Magnesium Manganese Molybdenum Nickel and compounds Particulate matter (PM) Phosphorus Selenium Silver Thallium Zinc Arsenic and inorganic arsenic compounds Mercury Hydrochloric acid Sulphuric acid Sulphur dioxide (SO2)
   While recognizing that greenhouse and noxious gases generated from the burning of these pellets will not be produced on site; rather, they will be generated at the location where the pellets are eventually burned, they still need to be assessed in considering the environmental impacts of the project.
3. Industrial scale burning of native forest wood or wood products is more greenhouse intensive than coal fired power. Whether or not it ends up competing with genuine renewable or with fuels such as coal will depend ultimately on where the pellets are sold and under what circumstances. However, wood fired burning is up to 6.4 times more greenhouse intensive than coal fired power[1].

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[1] Dr John Kaye MLC. Adjournment Speech 2 December 2008 "Our very rough analysis, based on forestry industry and peer-reviewed data, suggests that for every megawatt hour of energy generated by south-east native forestry biomass, more than 6.4 tonnes of CO2 would be released instantaneously. This is more than **6.4 times the amount of CO2 released from burning coal to produce the same amount of energy**. Certainly regrowth would bio-sequester some of this carbon but at a very slow rate. It would take about 80 years of regrowth to capture 5.4 tonnes, thus returning the

4. The Statement of Environmental Effects does not look at the full life cycle of the raw material (i.e. it ignores the greenhouse impacts of native forest logging. Logging of native forests to supply the Eden chipmill has been conservatively estimated at over 18 million tonnes per year[2].
5. Sustainability of native forest logging for raw material: no attempt is made to assess this.
6. In its proposal for a wood fired power station, SEFE (2010) claimed that "no native or plantation forest would be felled for the purpose of fuelling the plant" (19-3). However, Forests NSW expects that some timbers which are not currently used for woodchipping because they are either too red or too hard, and are not of sawlog quality will be used for power generation. The same must be assumed for this project: trees that are either too hard or too red to use for woodchips could be used for pellets, thus making logging even more intensive than current "Integrated Harvesting" for woodchips.

C. How to lodge your submission

Bega Valley Shire Council DA2011.35 Lot 16 DP 1066187. Submissions close on 24th February 2011. Send submissions to:

The General Manager
Attention: MB Fowler
Bega Valley Shire Council
PO Box 492
Bega NSW 2550
Or email to: council@begavalley.nsw.gov.au

To read the full Environmental Assessment, go to: http://www.woodchippingsux.net.au/pellet plant DA.doc.pdf

greenhouse gas emissions to the same level as coal." http://www.john.greens.org.au/media/adjournment-speech-eden-chipmill-and-green-power

[2] **Carbon pollution generated by logging for the Eden chipmill**
According to Mackey et al "Green Carbon" 2008, the average carbon carrying capacity for all the SE Australia eucalypt forests is 640 tonnes per hectare. In those forests in SE NSW where the actual carbon stored is currently less than the carrying capacity, this is entirely due to the previous operations of the Eden chipmill over the past 40 years, so it is valid to use Mackey's figure of 640.
According to FOI information, in 2006-07 FNSW logged 14,388 hectares in the Eden, South Coast/Southern and Tumut areas.
The figures below do not include the emissions from running the mill, and transport associated with logging contractors or deliveries to the mill. The calculation is based on:
Area logged x Carbon stock per ha x 40% (loss from logging) x 3.666 (converting C to CO2
Thus, for NSW:
14,388 x 640 x .4 x 3.666 = 13,503,080 tonnes of CO2
For East Gippsland:
4,500 x 700 x .4 x 3.666 = 4,611,600 tonnes
Total: 18,114,680 tonnes.
40% of the carbon stored in a forest is lost to the atmosphere when it is logged, even after 150 years. The weight of a carbon dioxide molecule is 3.666 times the weight of a carbon atom.