

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Protect our environment  
**Date:** Tuesday, 12 May 2020 2:26:35 PM

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

### **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 m<sup>3</sup>p/a. Ninety six percent of hardwood sawmills in Australia are less than 45000 m<sup>3</sup>pa 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](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.

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Cc:** [REDACTED]  
**Subject:** Re: Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Tuesday, 12 May 2020 10:09:39 PM

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**Dear Bega Valley Shire Councillors and Mr Constance,**

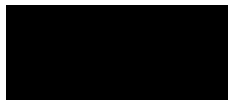
**Timber Optimisation Hub, Development Application (10-2020-81-1)**

**I write this in regard to the proposed DA for the Eden Woodchip Mill's Timber Optimisation Hub.**

**After the 'Black Summer' that we have just had - in which 80% of the forests that were intended to supply this mill were burnt - and in which an (under)estimate of a billion animals are thought to have been killed - it is flabbergasting to think that the woodchipping industry is looking to get it's hands on unburnt parts of the South Coast and East Gippsland.**

The wood chip industry needs to transition to plantation forests and cease the logging of native forests which even before the fire season of 2019/20 have so intensively degraded the forests of our area. But in consideration of all that we have lost over this last summer - and all that we are predicted to lose in a climate changed future - I beg of you to not allow this proposal to go ahead.

Regards,



**Moruya NSW**



[From The Embers - Stories from the Australian Bushfire Crisis](#)

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** DA at chip mill Timber optimisation hub  
**Date:** Friday, 8 May 2020 3:09:52 PM

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I would like to object to the increased capacity saw mill in Eden where the chip mill burnt down.

Our native forests need to be protected not logged more.

The damage to the chip mill could be fortuitous to our forests and although I would like see it not rebuilt at all, increasing the capacity would be abhorrent.

I have never understood how we could justify the massive number of tonnes of native old growth forest being put on ships and sold for a pittance to a foreign business.

I know that history will not be kind to people making these mistakes, when we look back and wonder why we destroyed our environment it will be obvious the chip mill should not be rebuilt.

Please register my objection to the DA submitted for the timber optimisation hub as I believe it would be damaging to both our environment and the economic development of Eden due to loss of jobs at the hardwood sawmill.

[REDACTED]

[REDACTED]

Kanoona NSW 2550

[REDACTED]

12 May 2020

Mayor and Councillors,  
Bega Valley Shire Council

Dear Mayor and Councillors,

### **Objection to DA 10-2020-81-1 Eden Timber Mill Expansion**

We wish to lodge our formal objection to this DA 10-2020-81-1 in respect of the construction of a log sorter, sawmill, pallet mill and briquette plant at Eden. As residents since 2005 and owners of two Bermagui properties, our objection is based on three principles:

- there are significant issues not properly addressed in this DA,
- it is not an appropriate time to approve a DA for a \$14.5m major expansion of the Eden Timber Mill when the community is totally distracted by personal issues surrounding the Covid 19 lockdown, and
- there are many flow-on land use, economic and environmental issues post the recent bushfires that Council needs to address before giving any approval.

The logging of our native forests is a highly divisive community issue and this DA and related issues need to be thoroughly examined and advertised to the community.

This is also a very strategic decision by Council that will affect the long-term economic future of the Shire. In its recent Draft Local Strategic Planning Statement, Council is promoting the pristine environment of the Bega Valley to attract new population, businesses and tourism. The recent bushfires and the flow on environmental effects of this DA are partly dismantling this strategic vision.

### **Lack of Advertising to Community**

This significant DA was lodged with Council on 23 March 2020 at the height of the Covid 19 health crisis. There has been no mention of this DA in Council News, local newspapers or community newsletters.

Given the environmental and economic significance of this DA, consideration of the DA should be deferred by Council until a thorough community consultation process is held. Apart from the DA, all the related environmental and economic issues need to be canvassed with the community.

### **Bushfire Effects Not Addressed**

The Council may see itself as just responsible for approving or not a commercial DA, based on whether it meets all the necessary rules and regulations. We think however, Council's responsibility runs much deeper in this case, given that 66% of the shire is native forest (26% State Forest, 40% National Park) and 60% of the shire burnt in the recent bushfires.

Within all the DA papers, we can find only one paragraph in the Statement of Environmental Effects (page 22) that provides any post bushfire information or update. This is just not good enough, given the severity of the recent bushfires, both in the Shire and as they affected the woodchip mill.

### **Land Use, Economic and Environmental Issues**

With 60% of our shire burnt in the recent bushfires, including large tracts of native forest, it is difficult to comprehend that we can immediately decide to continue logging 150,000 tonnes of these forests each year. The whole forest land management issue needs to be addressed with State Government directly.

Policy makers and this Council must recognise that land management including logging operations has profound effects on fire severity and fire frequency. Efforts to prepare for wildfires therefore require responses to historic and current land management practices. Certain standards for utilisation of our forest resources need to be

mandated, and independent third parties empowered to ensure that in the event of DA approval these standards are met.

A better balance between the logging industry and tourism industry needs to be reached that more accurately reflects their economic and environmental importance to the region.

### **Councillor Legal and Policy Compliance**

Under the Local Government Act, Councillors have a duty to represent the community. As explained above, there are many flow-on land use, economic and environmental consequences associated with this DA which have not been properly addressed as yet in this DA process.

Additionally, if this DA is approved without a more thorough review of its environmental implications, there is a distinct inconsistency with two of Council recent policy statements in 2019 around climate resilience; both with the "Climate Emergency Statement" (CES) and the draft Climate Resilience Strategy. The Mayor, Kristy McBain, on release of the CES said "Climate change goes beyond partisan politics, or state or federal responses. It is critical to mobilise all levels of government in order to inspire change and coordinated policies". Are there "triple bottom line" (economic, social and environmental) overall advantages to the shire from this DA proposal?

### **Height of Buildings**

It is noted on page 77 of the Statement of Environmental Effects (SEE) that the maximum height of the new buildings allowed by Council LEP is 14 metres. The new shed buildings at 11.5 metres are within this limit, with the height of the briquette plant chimney running to 16 metres which is also permitted. On this basis, the development is stated to have a low visual effect as it will blend in with the existing viewed landscape and established trees will provide filtering of the views to the proposal (see page 10). The anomaly is that the new buildings surround a pre-existing incinerator which is 30 metres in height (Plans page 14). The incinerator is not operational, however viewed from a distance, the incinerator gives every appearance as being part of normal operations and to the uninformed eye would be a highly visible part of the mill operations.

Other contributing issues to the poor visual aspect of the mill operations are the burning of the perimeter trees in the bushfire, the smoke from the briquette plant chimney and the giant stockpile of woodchips. No photos of the site and surrounding trees post the bushfire are included in the DA - it is suggested that these photos be supplied. We also suggest that Council require the dismantling of the incinerator, impose a height limit on the woodchip pile and require further tree planting on the harbour perimeter.

Council needs to consider the poor visual impression of this plant for environmental and other tourists to the area. This is most relevant to the passengers aboard the cruise ships as they come into Eden harbour to dock at the port. The visual impact of the mill operations for cruise ships is not addressed in the DA.

### **Chimney on Briquette Plant**

It is noted on page 10 that "the chimney would have a visually identifiable plume as the plant will burn sawmill and woodchip residues at approximately 10% of processing capacity with emission control measures designed to meet NSW EPA standards". There is no explanation of the economics in building a facility that only operates at 10% capacity. Council should require some periodic reporting of chimney emissions by an appropriate third party acting as regulator.

As noted earlier, Council is not in control of two-thirds of the land in its shire, being State Forest and National Park, which significantly inhibits Council's monitoring of land use in these areas and has implications for the land use it does control. Whether or not Council takes the regrettable decision to approve this DA, it should use this opportunity to develop regular formal dialogue with State Forests, timber mill and RFS as to their logging plans, remediation of logged areas, firebreaks and access road maintenance and development. As the opportunity arises Council should be encouraging the retention of old growth forests and progressive reduction in logging of native forests for woodchips.

Yours sincerely,



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Do not build the Eden Woodchip Mill!  
**Date:** Sunday, 10 May 2020 5:41:24 PM

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As 80% of the forest that were to be logged has been destroyed in the Bushfires it begs the question  
Is this a viable business?

Why waste money on this white elephant when there are better business opportunities that will provide a lot more than the 20 jobs the mill is offering.

Think of the future and let go of this destructive climate changer..... the community will thank you and so will the planet!

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Objection to Eden Wood Mill extension  
**Date:** Tuesday, 12 May 2020 10:48:42 PM

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To Whom it May Concern,

I am opposed to the expansion of the Eden Wood Chip Mill. The forests value as a source of habitat, ability to reduce sedimentation and source of carbon alone justify the halt to forestry in the South East of NSW not the ramping up of this destructive process.

This summer saw our forest decimated and their potential as habitat dramatically reduced. Do we really want to place more pressure on these valuable areas and the threatened species they act as a home for. Australia has the highest extinction rate of mammals in the world. We need to protect and enhance habitat not turn it into wood chips for 20 jobs.

Intact forests do an amazing job at holding our soil together and reducing sedimentation in comparison to a logged forest. This protects our water ways and aquatic species. Many older residents in the Eurobodalla Shire have in their life time seen the effects of logging in the upper catchment on our coastal water ways. Rivers such as the Tuross and Moruya River are choked with sand slugs caused from this.

BVSC has quite a progressive reputation for acting on climate change. This can all be thrown away with the long term loss of 1000s of logged trees that are no longer able to sequester carbon.

Please BVSC reject the application for extension of the wood chip mill if you want to have a sustainable future for all those that inhabit not only in the South East of NSW but our world. The impacts of this development are both long lasting and more than often irreversible.

Yours sincerely,

[REDACTED]

Moruya Heads NSW 2537

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[REDACTED]



**SUBMISSION AGAINST WOODCHIP MILL PROPOSAL**

[REDACTED]  
Beauty Point NSW 2546

[REDACTED]  
[REDACTED]  
[REDACTED]  
  
To Bega Valley Shire Council

I strongly oppose the proposal for a new woodchip mill. The only value in such a proposal is the few jobs it will provide, most of which, with some careful planning, could be filled elsewhere, and the arguments against the proposal are many and varied.

The whole woodchip industry in native forests is increasingly becoming uneconomical, devastating to the environment and outdated – especially in a region whose woodlands have been catastrophically impacted by the worst bushfires in a generation. At the moment we are destroying what is left of our natural heritage for someone else’s convenience, for the sake of a few temporary jobs and a quick profit. We have little Australian native forest left – destroying this for the sake of a handful of jobs and profit to the owners is like destroying the “Mona Lisa” painting for the value of the frame. I cannot believe a wood plantation solution cannot be found for genuine wood requirements. And beyond this, the opportunity is now here, after the fires, to begin looking at ending these old, destructive industries and starting new ones, with new ideas so that we can have a clean, thriving environment. Tourism would be a good place to start, as our region is still relatively pristine compared with Australia’s cities.

Please consider the wider picture and do not grant permission for this project.

Sincerely

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Wednesday, 13 May 2020 9:58:31 AM

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Dear members of the Bega Valley Shire Council

I am emailing in regards to Timber Optimisation Hub, Development Application (10-2020-81-1). I am asking you to not allow any expansion of the Eden woodchip mill. Many years ago I visited the old growth forests around Eden and they were truly magnificent places incorporating high biodiversity. I have visited the south coast over many years as my parents have been residents in both South Durras and Broulee since the 1980s. Over the last few decades so much has been logged merely for woodchips and sent away for paper making. It seems we now have the new horror of pallets and briquettes being planned for in the expansion of the mill.

We had the most horrific fires over the summer of 2019/2020, fueled by climate change and destroying so much of what was left of forests and animals on the south coast. I am finding it unbelievable that the Bega Valley Shire Council would be considering any expansion of the wood chip mill at this time. Locking in further logging of our precious forests for years to come is an insult to the children of the region and to the rest of the country. As a council you must recognise your responsibilities to act in the best interests of the people in Australia. What more does it take, following last summers shocking fires, for you to step up and act on climate change and the lost biodiversity in the Bega Valley region and in Australia as a country? A sound decision on this development application needs to not only assess direct environmental impacts but the impacts throughout the supply zone.

It is time to stop logging of our native forests. If the mill cannot function with plantation timbers it must be shut down. Future generations of Bega Valley Shire residents need you to transition to sustainable, ongoing jobs. People have listened to the scientists during the Covid 19 crisis. Now it is time to listen to the science on climate change and biodiversity and do what is required. There are many peer reviewed scientific articles you can find on the internet that provide you with the facts and figures on the detriments of logging native forests and the increasing dangers of climate change. Please do your research. People are looking to brave and inspiring leaders and politicians who can provide a new way forward in protecting our environment and looking after the future of generations to come. Please do not expand the Eden Woodchip Mill.

Regards

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Monday, 11 May 2020 12:54:47 PM

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**Dear Bega Valley Shire Council,**

**Please accept my submission in regards to this development proposal, Timber Optimisation Hub, Development Application (10-2020-81-1)**

**1. 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.

**2. 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.

**3. 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 the woodchip mill and is now in the process of closing. The mill will employ 20, according to the DA.

**4. 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 m<sup>3</sup>p/a. Ninety six percent of hardwood sawmills in Australia are less than 45000 m<sup>3</sup>pa throughput. - [ABARES 2019](#))

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

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

**6. 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.

**7. 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.

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** OBJECTION to Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Wednesday, 13 May 2020 8:07:01 PM

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Dear Council Staff,

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

I **OBJECT** to the **expansion of the Eden Chipmill's operations into pallets and briquettes**, as proposed in the above DA.

Native Forest "harvesting" for making millions of tonnes of woodchips is now and always has been an act of extreme vandalism which is totally unsustainable now and for the long-term, unless plantations are used. I have it on good authority that loggers continue to decimate good native animal habitat forests for this dreadful purpose, and it is well passed time that it stopped. The Woodchip mill at Eden **MUST NOT** expand its operations. In fact I believe it should be shut down, and the whole workforce transitioned to some other non-destructive industry. It has been operating for decades now without a break, chipping our beautiful forests for paper and cardboard mills in Japan and Taiwan. This is a terrible waste of our resources.

As well as the waste of resources, I am aware that the Mill is owned by foreign interests, and the ships on the woodchip trade are owned and operated by the Japanese. There are hardly any jobs for Australians in this trade, and the profits flow to overseas shareholders.

The public subsidies given to the forestry and logging operations give me the right to comment and object to such a dreadfully destructive industry. Not only are we losing all our forests and our native flora and fauna, but we are helping to **PAY FOR THIS DESTRUCTION**. Talk about adding insult to injury.

On top of all that, you are destroying your tourism potential: I have visited the South Coast of NSW many times, and it breaks my heart when I see vast swathes of clear-felled forest where there used to be thriving ecosystems, full of birdsong and burbling brooks. If this industry expands, I will never want to visit ever again. Who wants to see bare denuded landscapes, utterly destroyed? And what for? For the profit of some faceless foreign shareholder. It is criminal.

I reiterate: the Eden Chipmill operations must **NOT** be expanded as proposed in the above DA. Please accept this **OBJECTION**.

Thank you very much,

[REDACTED]  
Maroubra NSW 2035  
[REDACTED]

DA Number 10-2020-81-1

Title Timber Optimisation Hub

Objection in confidence No

Name [REDACTED]

Email [REDACTED]

Phone [REDACTED]

[REDACTED] address [REDACTED] Canberra ACT 2601

Reportable political donations or gifts None

## Objection to ANWE/SEFE 'Timber Optimisation Hub'

Application Number 10-2020-81-1

██████████ 13 May 2020

### Recommendations

1. Council should defer consideration of the development application until the Force Majeure issues are settled.
2. The Sawmill should be classified as a designated development requiring an environmental impact statement.
3. ANWE/SEFE should clarify the sources and quantities of sawlogs projected to be available to the Sawmill.
4. ANWE/SEFE should provide records of their due diligence system required under the Illegal Logging Prohibition Act.
5. ANWE/SEFE should explain how the number of heavy vehicle movements was estimated.
6. If consideration of the proposal is not deferred in accordance with recommendations 1 and 2, Council should refuse the development application.

### Note re Applicant

Allied Natural Wood Exports (ANWE) is the applicant for the proposed Sawmill and related infrastructure (Timber Optimisation Hub). The 'owner' is named as South East Fibre Exports P/L (SEFE). SEFE is a private company owned by ANWE. SEFE has Wood Supply Agreements (WSA) with the NSW Forestry Corporation (FCNSW) for pulpwood from the South Coast and Eden regions. ANWE has a WSA for sawlogs from the Eden region.

The proponent is referred to as ANWE/SEFE in the following comments. The 'Timber Optimisation Hub' is referred to as the Sawmill (it comprises a Log Sorter feeding into the Sawmill which in turn feeds into a Pallet mill and Briquette plant).

### Reasons for objection

1. Force Majeure information withheld

The 2019-20 bushfires burnt over 80% of the Eden and South Coast public native forests from which the existing and proposed developments draw most of their wood supply. The Statement of Environmental Effects (SEE, dated 16 March 2020) failed to disclose relevant information about the impacts of the bushfires, namely that as of February 2020 all ANWE/SEFE Wood Supply Agreements (WSA) covering public native forests in the Eden and South Coast regions remained subject to Force Majeure notices issued by FCNSW:

- 14 January 2020 - initial Force Majeure notice
- 11 February 2020 - second Force Majeure notice

On 6 May 2020, the Minister for Regional NSW stated in answer to a question on notice about the impacts of the fires on WSAs and Regional Forest Agreements (RFA) that:

“Forestry Corporation will review its sustainable yield models to take into account the impact of this season's fires and the outcome of that assessment will inform future planning. This work is expected to take around six months.”

The review of sustainable yield for each region has to comply with the processes set out in the relevant RFA, including being consistent with principles of ecologically sustainable forest management. Until this work is completed ANWE/SEFE have no basis to assume that FCNSW will be able to supply the amount or type of wood specified in any of the WSAs in either the short or long term. That in turn will influence the viability of the proposed development and its environmental, social and economic impacts.

Recommendation. Council should defer consideration of the development application until the Force Majeure issues are settled.

## 2. Designated development

ANWE/SEFE contend that the Sawmill is an ‘alteration or addition’ to the existing Chipmill and therefore not a ‘designated development’ as it otherwise would be (Environmental Planning and Assessment Regulation, Schedule 3). A designated development requires an environmental impact assessment, not just the Statement of Environmental Effects (SEE) provided.

Contrary to ANWE/SEFE’s assertion, the environmental impacts of the total Edrom Rd development are significantly increased if the proposed Sawmill is approved. A condition of ANWE’s sawlog WSA for the Eden Region is that it will build the Sawmill. If it builds the Sawmill, ANWE/SEFE would for the first time gain monopoly control over wood from public native forests in the Eden region. In addition, its pulpwood WSAs give the company substantial control over wood from native forests in the South Coast region.

### 2.1 Other companies

Blue Ridge Hardwoods which previously held a sawlog WSA in the Eden region is closing. It was caught up in the deliberate FCNSW strategy of switching to regrowth forests with smaller logs requiring different equipment to mill. In the South Coast region, sawlog WSAs expire in December 2020. Their future, if any, is also contingent on the outcome of Force Majeure arrangements and impacts of the bushfires themselves on wood supply and sustainable yield.

### 2.2 Monopoly impacts

ANWE/SEFE’s monopoly over wood from Eden region forests only comes into effect if the Sawmill is approved and built. Council’s decision therefore has two components - whether to approve the monopoly and whether to approve the Sawmill.

Leaving aside the question of post-bushfire wood availability, the creation of a monopoly significantly changes the combined operation and impacts of the Chipmill/Sawmill. It gives the company enormous power over the use and management of the region’s forests. Under the terms of the various WSAs, ANWE/SEFE can alter the total amount of wood it takes in a given year, the regions from which it comes, the mix of sawlogs and pulplogs and the area logged.



The rise and fall clauses in the various WSAs mean the total quantity could vary from year to year by up to 186,500 t (223,500 - 410,000 t) (see table).

The consequent impacts are greater than and different from those of the existing Chipmill. They include:

- blocking opportunities for a cleaner, greener community and economy
- perpetuating conflict over logging native forests
- creating dependence on a single industry with risks for jobs and the future
- impacting recreation, tourism and other forest-dependent industries
- limiting options to reduce greenhouse gas emissions and global heating by protecting and restoring native forests
- likelihood of undue influence over FCNSW operations and decisions
- fire risks and management
- impacts on water quality and quantity
- road use patterns and costs and impacts on other road-users
- employment opportunities in a diverse range of occupations limited by regional dominance of native forest logging

Recommendation: The Sawmill should be classified as a designated development requiring an environmental impact statement.

#### ANWE/SEFE WSAs - wood supply variation allowed at company's request

WSA	Quantity pa	Allowed annual variation
Eden sawlog WSA	25,000 m <sup>3</sup>	22,500 - 25,000 m <sup>3</sup> (10% undercut allowed)*
Eden pulplog WSA allocation 1	160,000 t	120,000 - 200,000 t (FCNSW required to supply 160,000 t)
Eden pulplog WSA allocation 2	40,000 t	0 - 40,000 t
South Coast pulplog WSA allocation 1	90,000 t	76,500 - 90,000 t
South Coast pulplog WSA allocation 2	50,000 t	0 - 50,000 t

\* 1m<sup>3</sup> = 1.2 t

### 3. Information inadequate

#### 3.1 Wood volumes and sources

The information in the DA is confusing and contradictory. The DA states that 70,000 t sawlogs will be 'optimised' from 150,000 t of logs classed and treated as 'chiplogs'. The implication is that sawlogs are currently being woodchipped at a high rate.

The quantity of sawlogs available from the sources identified is much larger than the rated capacity of the mill (see table). What accounts for the discrepancy?

Recommendation. ANWE/SEFE should clarify the sources and quantities of sawlogs projected to be available to the Sawmill.

Facility	Capacity	Source
Sawmill	70,000 t (60,000 m3)	20,000 t (17,000 m3) supplied by FCNSW from the Eden region. Note that ANWE's Eden region sawlog WSA is for 25,000 m3 pa 70,000 t of short logs via log sorter  Other: sawlogs salvaged from fire breaks, roadsides and hazard reduction activities in NSW and Victoria (M. McComb, Bega Valley fb video, 22 April 2020)
Log sorter	150,000 t	Most would be logs currently chipped (DA s.2.4.1)
Pallet mill	15,000 - 18,000 m3	
Briquette plant	4000 - 8000 t	

### 3.2 Foreseeable risks to log availability (other than current Force Majeure)

The Coastal IFOA (CIFOA) authorises the carrying out of logging and other specified forestry operations in accordance with the approval and the protocols. As the monopoly holder of WSAs for the Eden Region, there is a risk to ANWE/SEFE wood supply to the extent that forestry operations do not comply with the CIFOA. That risk may also extend to the commonwealth Environment Protection and Biodiversity Conservation Act exemption for forestry operations carried out in accordance with an RFA.

Recommendation. ANWE/SEFE should provide records of their due diligence system required under the Illegal Logging Prohibition Act.

Fire is a recurring event - large fires in 1952, 1968, 1972 and 1980 caused significant areas of forest to be converted to regrowth. Future fires will likely be worse with even more devastating impacts on forests, wildlife and wood supply (see 4.2).

### 3.3 Transport

When operational, the briquette plant is projected to generate one additional truck movement out per day and the pallet mill two to three b-doubles out per day (DA s.2.4). Heavy vehicle movements out generated by the sawmill to transport sawntimber other than pallets are not estimated and appear not to be accounted for.

Heavy vehicle movements per day (calculated on 240 days pa)

Year	2016	2017	2018	2019	2020	2021	2022
In	62	82	85	89	86	86.6	86.6
Out	1	2	2	2	2	5.6	5.6

From DA tables 4.1 (current) and 4.5 (operational)

Recommendation. ANWE/SEFE should explain how the number of heavy vehicle movements was estimated.

#### 4. Environmental, social and economic impacts

ANWE/SEFE have considered only on-site environmental impacts of the Sawmill. The impacts of logging on public native forests in the Eden and South Coast regions are a direct consequence of supplying wood to the Sawmill. They have flow on social and economic impacts that have not been assessed. Nor has there been an assessment of alternatives to the proposed Sawmill.

##### 4.1 Forests/threatened species

The 2019-20 bushfires burned millions of hectares in Queensland, northern NSW and Victoria as well as forests in the Eden and South Coast regions. Their extent and severity was unprecedented and the impacts on wildlife are catastrophic. In NSW nearly three million hectares of dedicated parks and reserves burned, together with an unknown area of forests protected by informal reserves and prescriptions. Billions of plants and animals were killed.

The Commonwealth government has identified 119 animal species, 191 invertebrates and 471 plants nationally as having the highest priority for urgent post-bushfire management intervention ([Bushfire Recovery](#)). Many of these species occur in the Eden and South Coast forests. Logging burnt forests, such as is happening in the Mogo, South Brooman and Yambulla state forests, is ecologically disastrous. It is taking place without assessment of whether the reserve system remains comprehensive, adequate and representative, without regard for the recovery of the Commonwealth-identified high priority species ([NSW Parliament questions on notice](#)) and with minimal changes to logging rules. The bushfires have rendered the entire policy framework that underpins native forest logging untenable ([Bushfires and RFAs](#)). They leave RFAs legally uncertain and failing in practice.

##### 4.2 Climate including fire threat

The extent and severity of the 2019-20 bushfires are a consequence of global heating. Future fires are likely to be similar or worse in intensity and impact, including on wood supply. Native forest logging makes many forests more fire prone and contributes to increased fire severity and flammability ([Lindenmayer et al, 2020](#)).

Logging also contributes to global heating by converting forests to younger smaller stands, reducing carbon storage and increasing greenhouse gas emissions. In the Eden region logging strategies have effectively liquidated 'mixed age' forests and the definition of 'sawlog' has been changed so that smaller logs from younger regrowth forests can be sold as sawlogs.

##### 4.3 A different future

This summer's unprecedented bushfires are a turning point for the forests and for the communities of southern NSW. Our current path leads to extinctions and ecosystem collapse. It reinforces the conflict over native forest logging and ignores the widespread support to bring 50 years of logging and woodchipping at Eden to an end. Globally there is an emerging movement for 'natural climate solutions' emphasizing the importance of protecting existing forests ([The Conversation](#)), alongside the switch to renewable energy. By rejecting this development application the BVSC can choose a different future for this most beautiful corner of the earth.

This is [REDACTED] submission in response to the Timber Optimisation Hub, Development Application (10-2020-81-1)

I would like to register my objection to the proposal, the numerous reasons for which I will now illustrate.

I am concerned that the council may approve the development on face value only. This is of course the hope of the applicants as the report does not look at any impacts beyond the sight to be directly developed. I believe this to be a gross oversight. This development is not just the simple erection of a few sheds. It will enable the wood chip mill 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. This would be a huge mistake.

While the DA only looks into the biodiversity impacts of the small area of the development sight, I believe the greater impact on our regions biodiversity must be taken into account.

I ask you, should our area continue to be subjected to this brutal treatment. Especially after the summer we have had. It is clear that logging not only impacts biodiversity in the short term directly, but also leads to a higher fire risk. This is simple science. Not only does logging potentially increase the fuel load by leaving debris, it also intentionally increases the prevalence of fire prone species as well as drying the forest significantly. Please read this article if you have not already.

[https://www.theguardian.com/environment/2020/may/06/compelling-evidence-logging-native-forests-has-worsened-australian-bushfires-scientists-warn?CMP\\_Share\\_AndroidApp\\_News\\_Feed&fbclid=IwAR31fCeIblTPgYty6rra7g19Fc8b1Bf3wfCuuiT8G99vnAcNSMGfzC27-Cg](https://www.theguardian.com/environment/2020/may/06/compelling-evidence-logging-native-forests-has-worsened-australian-bushfires-scientists-warn?CMP_Share_AndroidApp_News_Feed&fbclid=IwAR31fCeIblTPgYty6rra7g19Fc8b1Bf3wfCuuiT8G99vnAcNSMGfzC27-Cg)

Another thing that should be considered is the climate impact of logging. The destruction of carbon stores and soil structure has a massive impact on our ability to sequester carbon. Climate change is also no doubt effecting the frequency and severity of fires. This is a candle burning on both ends with us in the middle and it must be stopped.

By giving the go ahead to this development you are green lighting a continuation of destructive forestry operations for years to come. As well as creating an unfair and economically destructive monopoly that could starve out timber mills in the area. Timber mills who provide good quality wood from our beautiful hardwoods, not just crap. More jobs are likely to be lost than gained if this move is approved. If wood chipping was eased and faded out, these mills could be supported with plantation timbers. It is the wood chipping industry that thrives on native forest logging.

The Council, back before this terrible summer just past, made a commitment to addressing climate change. Bega Valley Shire declared a climate emergency and has developed a Climate Resilience Strategy, now is the time, in light of all that has happened, to exercise this strategy. This DA dismisses climate change as a matter that does not need to be considered, I say if you don't consider the real climate change impacts when looking at this development you are being negligent.

I am sure your aware of the impacts of the fires, I don't need to spell out the heart ache, the devastation. In our communities so many homes lost and lives also. 80% of out state forests have been burnt. I am not sure how much of our beautiful national parks were also lost, but I am sure it was not a dissimilar figure. This is an area in trauma, shock and sadness. Our human community and that of the bushland. We all need a chance to pause and grow back into our former glory. This will not happen if these areas are continually logged.

What we need is a moratorium on logging operations not a more towards more. We need to pause and assess what it is we want and need for this area to thrive. I understand these things are not necessarily in the hands of the local council, but this DA is. Please do not make rash decisions that may look like quick economic recoveries and ways forward, but just lead us further down the burning road we have been traveling. Take a moment. Please consider the true impacts of this development, they far out weigh the small benefits to the region.

[REDACTED]  
Princes Highway

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Saw mill development application  
**Date:** Tuesday, 5 May 2020 11:16:47 PM

---

After more than 80% of South Coast forests were burnt in the summer bushfires, the forests of our region simply cannot support the approval of a new sawmill, pallet and briquette plants.

This Development Application is not just about approval for a few 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.

It will stop 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 footprint of this new mill will extend far beyond the chipmill fence.

Bushfire impacts have been ignored.

Climate issues have been ignored

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

[REDACTED]  
Wallaga Lake Heights

**From:** [REDACTED]  
**To:** [RecordsMailbox](mailto:RecordsMailbox)  
**Cc:** [bega@parliament.nsw.gov.au](mailto:bega@parliament.nsw.gov.au)  
**Subject:** Objection - re - Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Wednesday, 13 May 2020 9:25:35 PM

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### **Submission to Bega Valley Shire Council**

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. 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 over logged.

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.

Jobs will be lost in local sawmilling. In 2019 Blue Ridge Hardwoods, with 55 employees lost the Eden sawlog Wood Supply Agreement to the woodchip mill and is now in the process of closing. The mill will employ 20, according to the DA.

This DA would allow 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.

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

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.

This proposal stops a transition to plantations for the wood chip 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.

yours sincerely [REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** New sawmills  
**Date:** Wednesday, 6 May 2020 10:18:52 PM

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I ask writing this as a rate paying resident of the Bega Valley.

At a time of Global Climate Crisis it would be ludicrous for the BVSC to approve any expansion of the Eden chip mill site and operations in native forests.

It is well documented that logging of native forests is increasing the fire risk within our area.

<https://www.abc.net.au/triplej/programs/hack/logging-made-last-summers-bushfires-worse-expert-review-finds/12216464>

Maintaining biodiversity is more important than ever, logging of native forests is destroying this.

These proposed mills are counter productive to creating jobs for a sustainable future.

If we as a community have any hope of averting the current climate crisis the BVSC will not support this development.

Thank you,

[REDACTED]

Towamba 2550

Sent from my iPhone

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Wednesday, 13 May 2020 1:01:15 AM

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Submission: OBJECTION

Please accept the following as my submission Objection to Timber Optimisation Hub, Development Application (10-2020-81-1)

1. While the Development Application appears to be for 3 colorbond sheds it will be a gateway approval for catastrophic logging of this unique area

Logging old growth forests for the woodchipping industry is economically and scientifically unjustifiable. In approving the DA Council will be allowing the industry to clear the forests of the South Coast and East Gippsland.

The development will make this one of the biggest native forest sawmills in Australia, processing 60,000 m<sup>3</sup>p/a. Ninety six percent of hardwood sawmills in Australia are less than 45000 m<sup>3</sup>pa 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 facility

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/DPI066187, 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



Coogee NSW 2034

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Cc:** [REDACTED]  
**Subject:** Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Saturday, 9 May 2020 10:18:51 AM

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I have serious concerns about the whole idea of allowing the chip mill to operate again. The bushfire impacts and climate change issues surely make the closure of the mill a no-brainer. I can't express my concerns any better than outlined below:

**1. 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.

**2. 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.

**3. 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 the woodchip mill and is now in the process of closing. The mill will employ 20, according to the DA.

**4. 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 m<sup>3</sup>/a. Ninety six percent of hardwood sawmills in Australia are less than 45000 m<sup>3</sup>/a throughput. - [ABARES 2019](#))

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

**5. 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](https://www.forestrycorporation.com.au/__data/assets/pdf_file/0006/1214637/allied-natural-wood-exports-pty-ltd-hardwood-forests-sawlogs.PDF)

**6. 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.

**7. 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.

Kind regards

A solid black rectangular box used to redact a signature.

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Woodchip Mill  
**Date:** Wednesday, 13 May 2020 1:21:28 PM

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Dear Council,

I do hope you DON' T give a licence for the Eden Woodchip Mill to harvest old growth forrests. I would be happy if the Woodchip only used Plantation wood - that would guarantee as you say 20 jobs.

Yours truly, [REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** re: Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Tuesday, 12 May 2020 10:10:43 AM

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My submission re: Timber Optimisation Hub, Development Application (10-2020-81-1)

I completely oppose the expansion proposal.

This proposal will set the scene for expanding the woodchipping and exploitation of the forests of the South Coast and East Gippsland, even though this industry is known to be a financial and environmental catastrophe. Approval of this project would make the urgently needed transition to plantation forestry harder and create incentives for intensifying native forest logging – despite the Victorian move to ban this industry and the strong public opposition to its subsidy and continuation. The DA does not accurately reflect the air quality, noise impacts, water resources and quality and motor vehicle traffic because it only considers the chipmill sites and ignores the rest of the supply chain necessary to keeping it running.

The devastating impact of the summer fires mean that we should be closing the chipmill not expanding it.

The impacts of native forest logging are significant and not sufficiently addressed in the application. During the devastating summer fires 80 percent of the forests available for logging in the South East were burnt and across the country an estimated one billion animals were killed.

The forests must be allowed to recover.

Now is the time for a moratorium on any logging of forests that are older than 80 years. This includes all regeneration in the aftermath of the 1939 fires.

The proposal is inconsistent with climate change mitigation strategies and will see the release of significant carbon stores into the atmosphere. It is incompatible with our Paris commitments.

The proposal is incompatible with local quality of life and tourism.

[REDACTED]  
[REDACTED] Fairfield VIC 3078  
[REDACTED]

## **Submission regarding D/A 10-2020-81-1 Timber Optimisation Hub**

I write to lodge my objection to the abovementioned development proposal. The main reason for my objection is that there has been no assessment of the impact of this proposal on the surrounding environment and the wider world.

Bega Valley Shire Council has declared a climate emergency and developed our Draft Climate Resilience Strategy so I feel that it is critical that this application is assessed in terms of its impact on our carbon emissions and the state of our environment here in the shire and beyond.

With more than 80% of our native forests lost in the recent fires, the local environment just cannot bear the impact of this proposal and we ask that the proposal be refused as ANWE hasn't made any assessment of the impact on our climate or forest environment. This is not just about approving three sheds on a block of land at Jews Head as the implications of this proposal going ahead would have dire consequences for our local forests and the threatened species contained therein.

An examination of the documents submitted with this proposal reveals that climate change is given only two dismissive references, one being that, in reference to the DCP, "5.8.5 – *Not relevant. Section 5.8.5 applies to residential development*", and the other related to the effects of carbon monoxide. This serious omission certainly has ethical problems and possible legal implications.

The various studies submitted with the application undertake assessments of various impacts over an area outside the property itself but fail to assess the impacts of the supply chain to the proposed development. This should include the impacts of the increased demand on the resources within our state forests, especially given the loss of 80% of these forests from the fires and the follow-on deleterious effects on water quality, soil erosion and wildlife. It is estimated that one billion animals may have been lost in the fires yet the Biodiversity and EPBC Act Protected Matters Report fails to address any losses from the fires. One assumes that this report was undertaken before the 2019/20 fires. The Statement of Environmental Effects actually says, "This assessment was prepared prior to the bush fires that affected the site in late 2019 and early 2020." There is reference to "*additional commentary...to address the changes to the site since this event*" but these relate to visual impact and biodiversity only on the site itself, not the wider area where the impacts have been disastrous.

Another serious concern of this proposal is the creation of a monopoly for timber processing, meaning that ANWE would get all forests logged in Bega Valley Shire plus a whole lot more from Eurobodalla Shire and down into Victoria. The proposed new mill is automated and will employ only 20 people to replace the more than 50 people who were employed with Blue Ridge Hardwoods to whom the timber supply was previously contracted.

Finally, Council really needs to consider the future impacts of ongoing logging of our native forests in terms of bushfire intensity. The 2019/20 fires demonstrated how



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** re: Timber Optimisation Hub, development Application (10-2020-81-1)  
**Date:** Wednesday, 13 May 2020 9:49:47 AM

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Good morning,

I am writing to express my concerns over the proposal to expand the Eden Chipmill.

It is obscene that wood chipping of native forests is already permitted in this area, and plans to expand these operations should under no circumstances be approved on the basis of irreversible environmental degradation. The issue is exacerbated by the bushfires experienced last summer of which the South Coast of NSW was one of the most severely affected areas.

If economic benefit in terms of employment is driving this development proposal then a comprehensive assessment must be made that includes the irreversible permanent deterioration of natural landscapes. In the opinion of many, there is no economic benefit worthy of the permanent destruction of native forest that is crucial to sustain threatened species and

Development of industry should focus on either further expansion of industries that do not have severe impacts on natural environments or considerable efforts should be made to promote growth of new industries that do not deteriorate the environment. Such examples would include Eco tourism, and other 'green' industries.

It is obscene that in the year 2020 and in light of the recent bushfire crisis that industry is focused on the expansion of activities which have a detrimental impact on the environment. The logging of native forest is a 'low hanging fruit' for industries and should be actively discouraged by public policy. Instead public policy should encourage innovation and expansion of industries that create new skills and opportunities for rural people.

[REDACTED]



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Cc:** [REDACTED]  
**Subject:** Eden Woodchip Mill submission  
**Date:** Wednesday, 13 May 2020 9:21:04 AM  
**Attachments:** [Eden\\_woodchip\\_mill.docx](#)

---

General Manager,  
Bega Valley Shire Council,  
13.5.202

Dear General Manager,

### **Application for expansion of Eden Woodchip Mill**

I write to lodge an objection to the proposed expansion of the Eden Woodchip Mill. As a resident of the neighbouring shire of Eurobodalla I am concerned about any increase in capacity to the mill due to its deleterious effect on the forests of the south-east.

We have just lived through the worst bushfires in our history. These fires were fuelled by drought which in turn was fuelled by climate change. Native forests need protection as carbon sinks and habitat for our already decimated wildlife.

I would like to take this opportunity to congratulate your shire for declaring a Climate Emergency and developing a Climate Resilience Strategy. I would have thought the expansion of the mill would be at odds with this declaration and strategy. It is well past time for the ceasing of subsidies to an industry that is causing harm to our environment. We need a just transition to a renewable economy that supports workers to enter industries for a sustainable future. Wood-chipping our precious native forests, or turning them into briquettes, is seriously hampering that future.

Yours sincerely,

[REDACTED]

[REDACTED], Mossy Pt, NSW.

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[REDACTED]

[REDACTED]



# Coastwatchers

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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 Coastwatchers Association Inc.

██████████  
Batemans Bay NSW 2536

ABN 66 003 550 939

Email: ██████████  
Home Page: [www.coastwatchers.org.au](http://www.coastwatchers.org.au)

- 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



The Coastwatchers Association Inc  
PO Box 521 Batemans Bay NSW 2536



Like us on [Facebook](#)

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 m<sup>3</sup>/a. Ninety six percent of hardwood sawmills in Australia are less than 45000 m<sup>3</sup>/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](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.

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Eden chip mill  
**Date:** Wednesday, 13 May 2020 1:01:20 PM

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To Whom It May Concern

I am writing to voice my objection to the expansions plans for the Eden Chipmill.

Our forests have been decimated by the recent fires, and we need to preserve what we have left.

There is no future in logging native forests.

Many thanks in advance,

[REDACTED]

Sent from my iPhone

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Opposition to the Eden Chipmill  
**Date:** Wednesday, 13 May 2020 11:54:14 AM

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Hi there

I'd like to voice my opposition to the Eden Chipmill.

I'm outraged by the proposal as it sets a terrible precedent. Native Forests must be protected, not opened up. They represent a dwindling number of ecological safe grounds. Especially after the horror bushfires.

Allowing this chipmill would not reflect public sentiment on this issue!

Plantation forestry would become harder and it would reward native logging.

PLEASE do not approve!

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Date:** Monday, 11 May 2020 2:42:42 PM

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Dear Madam / Sir,

11 May 2020

Re Development Application (10-2020-81-1): I call on Bega Valley Shire to reject this DA.

More than 80% of South Coast forests were burnt in the recent summer bushfires.

The forests and fauna of our region need protection - more logging is the last thing we should be considering.

If the Bega Valley Shire approves this DA you will be responsible for

1 Granting a monopoly to Allied Natural Wood Exports. They will be the buyer of all trees logged in the Eden Region. How is this good practice for competitive local economy?

2 Severely setting back the critical transition to plantations for the woodchipping industry. How is that environmentally responsible?

3 The continued intensive native forest logging which has already so degraded the forests of the South Coast. How is that going to encourage tourists to visit the "natural unspoilt south coast" ?

4 Locking in the use of native forest wood for at least another decade. How will native wildlife like the koala survive such an impact? Koala numbers have plunged 26% over the last 20 years in NSW. If we don't stop destroying koala habitat, this beloved icon which is a massive tourist attraction could become extinct in this state in a few short decades.

5 Contributing even more carbon to the atmosphere, hastening climate change. It is inconceivable that after the catastrophic fires of last summer Bega Valley Shire is ignoring the science and allowing more destruction of forests. These stores of carbon, provide us with clean air, good soil and water quality - essential elements for our very survival.

We can no longer ignore the climate issues for the sake of a very few jobs.

This DA ignores the impacts of the summer bushfires on the forests intended to supply the mill. It was written before the fires and has had no meaningful changes made to reflect the damage done by the fires. This is irresponsible and opportunistic.

80 percent of the forests available for logging were burnt over summer. At least one billion animals were killed. The forests of this region are already overlogged and there are serious doubts about whether these forests can supply enough resource to make the industry viable.

For long term employment and for the environment which sustains us, Bega Valley Shire should assist organisations like Allied Natural Wood Exports to fully transition to plantation timber.



Please don't approve this DA.

Yours sincerely,

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** SUBMISSION AGAINST ALLIED NATURAL WOODS EXPORTS, WOODCHIP MILL.  
**Date:** Friday, 8 May 2020 2:51:44 PM  
**Attachments:** [WOODCHIP MILL SUBMISSION-2.docx](#)

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To Council,

Please find attached my submission against the Eden Woodchip Mill project.  
(Allied Natural Woods Exports)

[REDACTED]

[REDACTED]

# WOODCHIP MILL SUBMISSION

From: [REDACTED]  
[REDACTED]

NSW 2546

Email address: [REDACTED]  
[REDACTED]

Preferred means of contact: Email

Date: 8th May 2020

**to Bega Valley Shire Council against Allied Natural Wood Exports' new mill.**

I wish to oppose the new mill on the following commonsense grounds.

## PREFACE

The recent fires have devastated the whole of the South East region of NSW. It would be a travesty to try to re-establish an industry that is outdated, uneconomic, and a scathing blight on the environment. Government, in allowing this development, is going against all the scientific conservation advice and putting private industry ahead of the natural wellbeing of the environment, as well as society's wellbeing. The "jobs" issue is recognised but the industry employs only a small number of people who could be employed elsewhere quite easily if there was a change in attitude. (see later in submission)

Personally, I am amazed that such a re-building and expansion request would be allowed, especially after both the fires and COVID 19. Society is now ready for a new change in vision and direction to a sustainable future.

To ignore the cause of the fires (it is scientifically proven that logging makes the fire prone areas more vulnerable) is morally reprehensible. To then allow further logging in the few bits of forest left, destroys sustainability for our future generations. Plantation timber areas are viable enough. Leave it there. Do not use our native forests for such menial products to export. It is short term thinking. Wrong, wrong wrong.

This application was made before the fires. Now that the area has little native forest left, and the population has been distracted by COVID 19, it is commonsense to look at this application in a totally new light. Do not resuscitate bad decisions! Government and Councils should be refashioning this post COVID 19 economy to provide jobs in different sectors. Leave this dirty market to fail.

## FIRES

See

<https://www.smh.com.au/national/logging-returns-to-native-forests-hit-by-bushfires-20200501-p54ots.html>

And

<https://www.smh.com.au/national/logging-likely-had-significant-effect-on-summer-fires-scientists-20200505-p54q2m.html>

Both the above articles express the scientific arguments against repeating the same mistakes of the past, therefore I won't list them here. It is enough to read and consolidate the articles.

Our Bega Shire community has been hit hard enough. Our native forests are precious.

## JOBS

The media concentrates on job losses suffered from the fires. This is THE opportunity to put dirty industries to bed, and put all the support behind such clean industries as solar and wind. We also have a current project underway which promises to be bigger and better than felling forests. It is called THE BUNDIAN WAY. Put our money behind this and in future years this south east area will be known throughout the world, bring the right people, doing the right thing, to our area and create more prosperity. More jobs could be created, and the wellbeing of the community will be enhanced. It just needs new thought and enthusiasm. The knowledge is already there.

Do NOT think truck drivers are only truck drivers for timber. They are your everyday guys just getting a living. With good direction from government, and some support, they would probably be happier being part of the future clean employment opportunities. They can be trained to be part of this new enterprise. Very few people actually work on site.

To sum up, I am pleading with you, as a 70 year old, I want to leave this planet with hope for my grandchildren. A new clean environment and better ways to earn a living.

You have the opportunity to say no to this backward venture. Dont repeat mistakes.

## COMPROMISE

At least you could delay the decision until a properly directed examination of this industry is made. We don't need to export our precious forests to make non essentials for other countries.

Remember all the intelligent commentators who are hoping for a "new normal" after COVID. Let's be part of that. Look to a sustainable future.

Thank you for this opportunity to submit my concerns. I speak for many.

Yours sincerely

A solid black rectangular box used to redact the signature of the sender.

8th May 2020.

■

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Date:** Tuesday, 5 May 2020 6:32:08 PM

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

### **Submission to Bega Valley Shire Council**

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

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.

The development will make this one of the biggest native forest sawmills in Australia, processing 60,000 m<sup>3</sup>/a. Ninety six percent of hardwood sawmills in Australia are less than 45000 m<sup>3</sup>pa throughput. - [ABARES 2019](#))

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

**2. 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, more than 80 percent of the South Coast forests available for logging were burnt and simply cannot support this. 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. Forests of the entire South Coast and East Gippsland would be under threat of being logged. Old-Growth forests took 100s of years to grow and cannot be replaced quickly. If people want to harvest, they need to sow and grow their plants, forestry should be required to do that as well and harvest responsibly and sustainably.

**3. 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. Trees absorb CO<sub>2</sub>, especially old-growth trees, which is direct climate action. Young trees take at least 20 years to absorb a considerable amount of CO<sub>2</sub>. Therefore our first consideration should be how to protect our childrens' future from climate change. Reducing our carbon footprint should be the first step.

**4. It would stop a transition to plantations for the woodchipping industry and perpetuate intensive native forest logging which has already massively 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.

**5. 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.

**6. This DA, if granted, would create 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-](https://www.forestrycorporation.com.au/__data/assets/pdf_file/0006/1214637/allied-natural-)

[wood-exports-pty-ltd-hardwood-forests-sawlogs.PDF](#)

**7. 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.

To prevent further loss of trees and animal habitat, we need a logging moratorium. With 80 per cent of South Coast forests burnt - now is the time to end native forest logging. The current fires have also burnt the Eden chipmill, which for 50 years has been the driver of all logging on the far south coast. Fires have killed over a billion animals and generated hundreds of thousands of tons of carbon dioxide and other pollutants.

Please prevent further disasters by degrading our soils and creating wind channels from logging, which dry out the land further.

Best regards [REDACTED] [REDACTED] Tathra Australia Ph [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Every page, we don't print, saves trees and water

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Cc:** [REDACTED]  
**Subject:** Eden Woodchip Mill  
**Date:** Wednesday, 13 May 2020 2:29:00 PM

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To Whom it May Concern,

I am writing in regard to the proposed rebuild and expansion of the Eden Woodchip Mill. I am appalled and totally opposed to this proposal.

I would imagine that the decimation of the south coast bush during the recent massive fires, would draw much more concern in regard to logging of an already fragile region.

The thought that valid research would be ignored in relation to the increased vulnerability to bushfire that logging creates, reeks of arrogance.

Science already has proven that forests that have been logged and regenerated are significantly more likely to burn at higher intensity. Logging makes forests drier and leaves behind flammable debris on the ground. Logging removes most of the water from the landscape and replaces it with small dry kindling. The forests grow back more fire-prone and remain that way until they become mature which can take 100 years or longer. Logging replaces the old giant trees with younger ones that look like toothpicks, grow closer together and dry out the soil. These are scientific facts.

The Eden Mill has already been decimating huge areas of our forests and releasing large amounts of carbon into the atmosphere when science and common sense tells us we should be growing forests to deal with the increasing threat of climate chaos.

Surely we need to be supporting industries that are sustainable, cost effective, morally accountable, conducive to both human and environmental health while providing long term employment. Eden Woodchip Mill fails in all these regards.

Andrew Constance you have appeared on our screens during, and after the recent bushfires, telling us of your deep seated concern and passion for the south coast and the people therein. I have developed a strong sense of cynicism over the years listening to our elected officials professing their care for this country and it's people and then supporting industries that have been proven to have a long lasting negative affect on our futures. Maybe this is your chance to prove that your heartfelt concerns for this region are honest and to be trusted.

Regards [REDACTED]

Sent from [Mail](#) for Windows 10



Leanne Barnes  
General Manager  
Bega Shire Council  
PO Box 492  
Bega NSW 2550  
[council@begavalley.nsw.gov.au](mailto:council@begavalley.nsw.gov.au)

cc: Andrew Constance MP  
[REDACTED]

**Submission to Bega Valley Shire Council**  
**Expression of opposition to Timber Optimisation Hub DA 10-2020-81-1**

Dear Ms Barnes and all Councillors

I write to express grave concern at the proposed extension to the ANWE mill. The mill is already decimating huge areas of our forests and releasing large amounts of carbon into the atmosphere with its woodchipping. We need to be growing forests to deal with the climate chaos not destroying them. After the fires the forests of our region simply cannot support this expansion of the mill to make it one of the biggest native forest mills in Australia and the monopoly buyer of every tree logged in the Eden Region as well as the bulk of trees logged in Eurobodalla and Shoalhaven. As a Eurobodalla resident I despair at this commitment.

**Bushfire impacts have been ignored**

In the DA the 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 over-logged and there are serious doubts about whether the forests can supply enough resource to make the industry viable.

**Climate issues have been ignored**

The Bega Valley Shire has declared a climate emergency and has a *Climate Resilience Strategy*. This DA makes two 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.

**Stymies transition to plantations for the woodchipping industry**

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 five yearly extensions after that.

**Detrimental to tourism**

The burgeoning cruise ship and other tourist visits to the region are better supported by more intact and ecologically healthy forests than less. Who wants to visit a compromised forest? When the tourist and resident amenity of forests are coupled with the carbon sequestering potential of standing forests, I submit that our forests are worth more economically when standing than razed. We no longer need view this as a trade-off between economics and environment.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] 2123 Malua Bay NSW 2136  
[REDACTED]

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

**Submission to Bega Valley Shire Council**

**12.5.20**

from [REDACTED] **PO BOX 1162 Bega 2550 NSW**

**Please read my submission AGAINST this outrageous proposal in our shire.**

I don't see that it is even really a Council decision, apart from whether to approve a building or not. I would hope that Council does not pre-empt any approval by allowing any sheds to be built on the site.

It is an issue of state significance and surely will go to the State government for consideration and environmental assessment .

I cannot understand that such an idea could even be considered at this time. When our summer fires burnt down the chip mill, as well as all of the forests around it , I thought that this might finally be the end of the chipmill destroying our forest ecosystems .

I thought, here is an opportunity, to evolve the site into something that reflects the desires of the people of this area, and around the country to adopt renewable energy and model regional economies that gave back to community. The site could become a renewable energy hub feeding energy back into the Eden community and being an educational model of what is possible for our future.

But No. This is the greediest option that could have been thought of .

It is about providing the means for the woodchipping industry to tighten its grip on all of the forests of the South Coast and East Gippsland area and make this one of the biggest native forest sawmills in Australia.

It is not about timber optimisation, any more than woodchipping is about using forest "waste". Both are about forest ecosystem destruction , loss of jobs , landscape, water quality and bird, plant and animal species.

It says a lot about what we choose to ignore or value in our world.

**Climate issues have been ignored**

The Bega Valley Shire has declared a climate emergency and has a Climate Resilience Strategy. This DA does not fit into any pattern of resilience or climate mitigation in its impacts on the land.

The DA makes 2 minor references to climate, one of them dismissing it as a matter to be considered, because the project is not residential.

I would suggest that this raises ethical and possibly legal issues around approval of the DA. It is 2020 and we need to be taking REAL action to REDUCE our impact on our atmosphere and the ecosystems of the earth on which we rely.

### **Bushfire impacts have been ignored.**

The DA, was written before the summer bush fires, and the Biodiversity and EPBC Protected Matters Report has not been changed to recognise that 80% of our forests were BURNT over summer.

It is clearly an environmentally irresponsible idea to even think about taking more away from our recovering forests and the wildlife that is relying on it for their recovery.

Also, the “timber” industry has a habit of being given quotas for large amounts of forest logs etc, and then when they are not available (ie. already cut down / not grown back ) they ask for compensation, taking important funds away from being spent on education, health care , and arts facilities for the benefit of our community.

The “Border fire that raged through the chipmill site was an intense fast moving fire, largely because the forest that it was burning had been so degraded by the last 50 years of woodchipping.

Woodchipped forest regrows into a fragmented landscape of even age trees rather than a more diverse, mixed aged, undisturbed forest, which has been shown to be more resilient to the impacts of fire.

[1] The Guardian reports: [‘Compelling evidence’ logging native forests has worsened Australian bushfires, scientists warn](#)

**This DA would make it more difficult to transition to using plantations for the woodchipping / timber industry and perpetuates intensive native forest logging which has already degraded the forests of our 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. We have seen with the passing of the RFA 20 years ago, that the ability to review or wind back this industry once they have approval is nigh on impossible.

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.

This was a locally owned and operated business providing hardwood timbers to residents and the building industry in this area.

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. How is it that ANWE gets to take all of our valuable timber resource to degrade it into an inferior product and sell it overseas, with profits also going there and employ only 20 people, according to the DA.?

Please DO NOT allow the Bega Valley to become a demolition ground for forests. we have so much to offer people in terms of natural beauty and eco tourism. It would be a sad hypocrisy to have this huge demolition plant on the southern edge of the beautiful Sapphire Coast .

**The footprint of this new mill will extend far beyond the chipmill site.**

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.

This is similar to the EPBC Act not being applied to State Forest operations.

State Forest are continually being shown by citizen scientists and others to be breaking their own environmental rules around stream buffers, endangered species, habitat retention trees, logging in rocky areas etc etc .

The consequences for our native forests and wildlife, the impacts on water quality & availability and the CO2 emissions must be considered.

Finally; There are many compelling moral, environmental and even economic reasons to reject this DA.

Bega Valley Council will be acting in the best interests of our common future to reject this DA and draw a line in the sand for holding to a future of sustainable energy production and sensitive use of our natural resources in the region.

sincerely

for the future



**From:** [REDACTED]  
**To:** [RecordsMailbox](#); [RecordsMailbox](#)  
**Subject:** Submission re Allied Natural Wood Exports Development Application  
**Date:** Tuesday, 12 May 2020 9:33:42 PM

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Submission re: Allied Natural Wood Exports (ANWE) Development Application to build a new sawmill, a new pallet plant and a new briquette plant.

I respectfully lodge my objection to the above development application by Allied Natural Wood Exports.

If granted it will perpetuate the intensive native forest logging that has degraded the forests of the region, destroying native animal habitat, including that of the precious small remaining population of koalas in the area.

The DA ignores the impacts of the summer bushfires on forests intended for supply to the chip mill. Written before the fires, there have been no changes made in the DA to reflect the damage done – and as locals we know only too well how extensive that damage has been.

80% of the forests available for logging were burnt with an estimated 1 billion animals killed by the unprecedented raging fires!

Our regional forests have already been overlogged, and to supply enough timber to make the industry viable would be devastating.

I object to this DA as it would make it one of the biggest native forest mills in Australia and the monopoly buyer of every tree logged in the Eden Region (as well as the bulk of trees logged in Eurobodalla and Shoalhaven).

The mill is already decimating huge areas of our forests and releasing large amounts of carbon into the atmosphere with its woodchipping. We need to be growing forests to deal with the climate chaos not destroying them.

The forests of our region simply cannot support this expansion.

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.

And last but not least, it would not facilitate, indeed would stop a transition to plantations for the woodchipping industry and perpetuate 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.

I very strongly and sincerely oppose this misguided application.

[REDACTED]  
[REDACTED]  
Bodalla 2545.

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Tuesday, 12 May 2020 9:28:35 PM

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### **Submission to Bega Valley Shire Council**

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. 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 over logged.

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.

Jobs will be lost in local sawmilling. In 2019 Blue Ridge Hardwoods, with 55 employees lost the Eden sawlog Wood Supply Agreement to the woodchip mill and is now in the process of closing. The mill will employ 20, according to the DA.

This DA would allow 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.

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

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.

This proposal stops a transition to plantations for the wood chip 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.

Regards

[REDACTED]  
Sent from my iPhone

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** OBJECTION to Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Wednesday, 13 May 2020 8:07:01 PM

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Dear Council Staff,

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

I **OBJECT** to the **expansion of the Eden Chipmill's operations into pallets and briquettes**, as proposed in the above DA.

Native Forest "harvesting" for making millions of tonnes of woodchips is now and always has been an act of extreme vandalism which is totally unsustainable now and for the long-term, unless plantations are used. I have it on good authority that loggers continue to decimate good native animal habitat forests for this dreadful purpose, and it is well passed time that it stopped. The Woodchip mill at Eden **MUST NOT** expand its operations. In fact I believe it should be shut down, and the whole workforce transitioned to some other non-destructive industry. It has been operating for decades now without a break, chipping our beautiful forests for paper and cardboard mills in Japan and Taiwan. This is a terrible waste of our resources.

As well as the waste of resources, I am aware that the Mill is owned by foreign interests, and the ships on the woodchip trade are owned and operated by the Japanese. There are hardly any jobs for Australians in this trade, and the profits flow to overseas shareholders.

The public subsidies given to the forestry and logging operations give me the right to comment and object to such a dreadfully destructive industry. Not only are we losing all our forests and our native flora and fauna, but we are helping to **PAY FOR THIS DESTRUCTION**. Talk about adding insult to injury.

On top of all that, you are destroying your tourism potential: I have visited the South Coast of NSW many times, and it breaks my heart when I see vast swathes of clear-felled forest where there used to be thriving ecosystems, full of birdsong and burbling brooks. If this industry expands, I will never want to visit ever again. Who wants to see bare denuded landscapes, utterly destroyed? And what for? For the profit of some faceless foreign shareholder. It is criminal.

I reiterate: the Eden Chipmill operations must **NOT** be expanded as proposed in the above DA. Please accept this **OBJECTION**.

Thank you very much,  
Claire Bettington

[REDACTED]  
Maroubra NSW 2035  
[REDACTED]



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Wednesday, 13 May 2020 5:01:28 PM

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Dear Bega Valley Shire Councillors.

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

I am writing to voice my vehement objection to the above Development Application.

I do not accept that this proposed development is only about building new buildings to replace those lost in the recent bushfires. It is about increasing capacity of the Allied Natural Wood Exports to mill saw logs and that can only mean increased native forest logging. 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.

I object to increased native forest logging on the following grounds:-

1.

This is completely contrary to council's undertaking to the community to address, in all ways available to local government, the existential threat of climate change via the Climate Emergency Declaration (CED). While the (CED) unfortunately does not go far enough because it excludes climate mitigation action in the agriculture sector, it's intent is crystal clear: the people of the Bega Valley want action on climate change. Approval of this development would be to ignore the wishes of the constituency you represent. Also the CED was passed before the horrendous summer bushfires. One can only assume that sentiment around climate change mitigation has increased since Bega Valley Shire residents saw first hand the effects of a warming climate. This is set to worsen in coming decades.

2.

The science of connection between native forest logging and climate change is also crystal clear. Leading Australian forest ecologists such as David Lindenmayer have demonstrated that native forests are the best means of carbon sequestration and also of moisture production ie rainfall. All Rural Fire Service leaders, past and present, agree that the recent bushfires were due to the unprecedented dryness of the forest due to the long running drought. The long running drought was, in turn, the result of climate change. To increase logging operations can only aggravate this cycle.

3. The financial cost to the three tiers of government of cleaning up the bushfire damage and repairing public infrastructure was offset by the generous donations. This is unlikely to occur year in and year out, so the full cost of bushfire recovery in the years to come will be born by government. Add to this the economic loss through greatly reduced tourism when tourism is a sector on which our Shire depends and the financial cost far outweighs the benefits of this development to our Shire.

4.

We are advised that more than a billion native animals lost their lives in the recent bushfires. Millions of hectares of habitat have been destroyed. Those animals who survived have a much reduced habitat in which to feed and hide from predators. All logging in burned forest with regenerative potential and in unburned forest, must be immediately halted while a thorough assessment of the loss and recovery strategies, are carried out. Enabling any increase in forest logging via this development is tantamount to killing native animals, which is illegal apart from being cruel and immoral. I hope there are no councilors who condone harming native animals via any means.

5.

I have heard some people say things like “we have to burn the bush before it burns us”. This is completely contrary to the science of forest ecology, climate change and bushfire. While it may be true that if we concrete the entire Bega Valley we would effectively mitigate bushfires risk, it is equally true that nobody would live here if that were the case. And ecological problems of other kinds would arise. Our response must be consistent with the science. Any prescribed burning, were it to take place, must be led by Indigenous people with traditional knowledge of how to care for country.

And all this to produce woodchips for export.

I call on all councilors to rationally consider all ramifications of this development application and deny it on the grounds of the massive ecological damage it will do to our Shire, the economic damage that will flow on from that. This is all according to the science. Furthermore the continued decimation of our native animal populations through habitat loss is something councilors must not countenance under any circumstances.

Yours sincerely

[REDACTED]

[REDACTED] Fishwick

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Timber Optimisation Hub D. A.  
**Date:** Wednesday, 13 May 2020 11:40:34 AM

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

This DA constitutes a further step in the entrenchment of industrial scale logging in our region's native forests, thereby impacting adversely on regional biodiversity and the forests' capacity to store carbon.

The "Biodiversity and EPBC Act Protected Matters Report" was written before the 2019/20 bushfires and consequently does not reflect the changed circumstances stemming from the burning of around 75% of the region's production native forests. The environmental impact of these fires could well prove to have been profound. The impacts of logging in this changed environment need to be assessed by those with the expertise to do so. Before this DA is rubber stamped, these matters should be addressed.

[REDACTED]

[REDACTED]

Candelo NSW 2550

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Submission re DA (10-2020-81-1)  
**Date:** Wednesday, 13 May 2020 2:17:51 PM

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

**Submission to Bega Valley Shire Council**  
from [REDACTED] Candelo, NSW, 2550

**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 m<sup>3</sup>p/a. Ninety six percent of hardwood sawmills in Australia are less than 45000 m<sup>3</sup>pa 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](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.

**Submission on Allied Natural Wood Exports Pty Ltd's Development Application to Bega Valley Shire Council for a Timber Optimisation Hub, (10-2020-81-1)**

To The General Manager

Bega Valley Shire Council

Wednesday 13th May, 2020

This Development Application has cause for deep concern for anyone who values the natural environment for its contribution towards water supplies, biodiversity, fire risk and climate mitigation.

The development will make this one of the biggest native forest sawmills in Australia, processing 60,000 m<sup>3</sup>/a (ABARE 2019).

Given that the whole wood chip market was/is predicated on a gross misrepresentation that only "forest waste" would be exported, how can the public have confidence that this DA with the addition of briquette facility would only be based on industrial waste and will not have a serious impact on the natural heritage of our region.

Given that the logging representatives have such grave concerns over saw log supplies that they wish to log national parks, and indeed have, using the recent devastating fires and park closures to cut trees along national park roads - logging which made very little strategic fire fighting sense - this DA should be critically examined in the light of its impact on people and wildlife in our region.

Research work by Professor David Lindenmayer from the Australian National University finds that logging increases the risk of bush fire for decades to come.

*"We can tell from past work, both ourselves, University of Melbourne work, and University of Wollongong research, that shows that logged-forest is more prone to high-severity fire. And that's actually results seen, not only in Australia, but seen all over the world.*

*So logging adds to the fire burden, it doesn't take it away. And people should be aware that a forest that's logged tomorrow will still be at elevated fire risk, in 2060 — so that's 40-years from now."* (Interview with Linda Mottram, ABC RN, PM 8 Jan 2020)

The Wood Supply Agreement, which requires the approval of this DA, will lock in the use of native forest wood for at least another decade, with 5 yearly extensions after that. The Auditor-General in the past has noted that trees are being cut down at a faster rate than the forests can regrow. Past droughts and the mega fires of 2019/20 would only strengthen that concern. It appears that wood supply agreement volumes are based on industry optimism and belief rather than the capacity of local soils and rainfall to generate sufficient growth.

Even logging industry supporters concede this. Andrew Constance MP, when addressing the Candidates Forum in Bermagui in 2019 said he was surprised at the excuse from Forestry Corporation that an Eden fire in the 1980s was the reason that there was as a shortage of sawlogs and that there would have to be an investigation into the future supply. Since then the forests have been severely impacted by drought and mega fires. And there has been no proper investigation into the viability of future sawlogs.

If the industry and relevant ministers were really operating in a scientific way, with full weight being given to the precautionary principle, then the volumes of timber being extracted would be wound back substantially, if not stopped altogether, until there was a proper environmental accounting for the true worth of the public forests for the greater good, not as a resource to enrich a few through unsustainable industrial scale logging.

*“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 per cent of the forests available for logging were burnt. An estimated one billion animals were killed. The forests of the region were already over logged and there are serious doubts about whether the forests can supply enough resource to make the industry viable.*

*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.”* (SERCA DA submission)

Retention of our native forests is the cheapest form of climate mitigation.

As the National Trust submission on this DA outlines:

*“Despite this major footprint, this DA examines only the environmental impacts of the planned sawmill on the 100 ha site owned by Allied Natural Wood Exports south of Eden and its immediate surrounds. It fails to mention the significant environmental, biodiversity and climate change impacts of this industrial scale.”*

The burden of responsibility on Councillors to approve this DA is therefore heavy. Over a thousand threatened species are already listed in this state. Forestry Corporation cutbacks and cost savings in an attempt to show a small notional profit (as a return on equity) means the logging is not supervised or surveyed to an adequate degree.

Councillors should not make a decision that gives greater weight to the jobs involved in logging and milling, diminishing as they are due to lower commodity prices, available supply and mechanisation. A reasonable assessment of the worth of the DA should take into account the likely environmental impacts and effects on tourism, fire / climate mitigation and water catchments.

Ask yourselves, long after the DA decision is made, and the forests degraded and wildlife diminished, who besides the contactors and mill owners will have received a substantial benefit from the operations in public forests? Not the general public, not the natural heritage, not the NSW Government nor even the Forestry Corporation. What will be your legacy for future generations?

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

**Submission to Bega Valley Shire Council**

**5-5-2020**

**This Development Application should be rejected out of regard for the following considerations:**

## **1. Overexploitation of the Forest Resource**

This Development Application will provide the means for the woodchipping industry to tighten its grip on the forests of the entire South Coast and East Gippsland at the expense of natural values and tourism. The development will make this one of the biggest native forest sawmills in Australia, processing 60,000 m<sup>3</sup>/a. The mill will continue to produce typically over 600,000 tonnes of woodchips a year.

## **2. Monopoly on Resource**

Allied Natural Wood Exports (ANWE) is seeking contractual entitlement to every single tree cut down from State Forests in the region. This should not be permitted as it will limit the industry's needs to ANWE's needs.

## **3. Wood Supply Agreement**

The Wood Supply Agreement, which requires the approval of this DA, This locks in the use of native forest wood for at least another decade, with 5 yearly extensions after that. This is unwise because it impedes the transition to plantations for the woodchipping industry and locks in continuing intensive native forest logging with detrimental effects on wildlife and natural values.

## **4. Impacts Beyond the Chip Mill Perimeter.**

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. Impacts will be incurred far more widely and these should be considered throughout the supply zone.

## **5. Bushfire Impacts**

The impacts of the February 2020 bushfires need to be fully taken into account. The "Biodiversity and EPBC Act Protected Matters Report" makes no reference to this. An estimated 80% of the forests available for logging were burnt and millions of animals were killed. The forests of the region have been heavily over logged since the inception of woodchipping in 1969. It's time there was a return to sustained yield forestry.

## **6. 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.



Fairfield  
NSW 2165



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Submissions re Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Wednesday, 13 May 2020 3:46:53 PM

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**Hello**

**please accept and add in to your system the two submissions re DA Timber Optimisation Hub, Development Application (10-2020-81-1). Both are pasted below in to this email, thanks**

[REDACTED]

To Whom it May Concern,

I am opposed to the expansion of the Eden Wood Chip Mill. The forests value as a source of habitat, and all of it's actions in positively effecting the environ for humans and flora fauna.

This summer saw our forest decimated and their potential as habitat dramatically reduced. Do we really want to place more pressure on these valuable areas and the threatened species they act as a home for. Australia has the highest extinction rate of mammals in the world.

As a resident of the Deua River Vally I have seen the loss of habitat, at my doorstep; the loss and lack of animals is quite profound.

By expanding or replacing the mill we will not see protection of what we have left.

Bega shire has quite a progressive reputation for acting on climate change. By supporting this DA so much is at stake, for us and for future generations.

We all know that business' making an investment expect a return.....for the sake of a small amount of employment in that industry there is so much to lose.

Please reject the application for extension of the wood chip mill if you want to have a sustainable future for all those that inhabit our region.

Yours sincerely

[REDACTED]

Deua River Vally  
NSW 2537

To Whom it May Concern,

I am opposed to the DA for the expansion of the Eden Wood Chip Mill.

Our forests are needed and as part of the bushfire recovery it wil take years for things to be restored.

This summer saw our forest destroyed and their potential as habitat dramatically reduced.

We need to encourage more flora and fauna after this loss, not offer up our precious remaining forests for more destruction. The forest plays a part in protecting not only plants and animals, but also protects our waterways and overall quality of life for all of us.

This is not something that an be easily replaced once it has gone.

By expanding or replacing the mill we will not see protection of what we have left.

Please reject the application.



Deua River Vally  
NSW 2537

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Timber Optimisation Hub, Development Application (10-2020-81-1) - submission  
**Date:** Wednesday, 13 May 2020 1:22:56 PM

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Dear council,

As a concerned resident and taxpayer in NSW, I wish to express my opposition to this proposal which I understand has the potential to lead to more woodchipping in the beautiful forests of the South Coast and East Gippsland.

I do not understand how this proposal would assist in the transition to plantation forestry, which is surely what we need, given that it appears to create incentives for intensifying native forest logging.

Finally, I am somewhat perplexed as to how this proposal could gain approval, given the financial and environmental risks that it poses. Following the horrendous fires earlier this year, surely responsible stewards conscious of their fiduciary duties would be closing chip mills rather than expanding them.

I look forward to your response and actions commensurate with your responsibilities.

Yours sincerely,

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** SUBMISSION DA 10-2020-81-1  
**Date:** Tuesday, 12 May 2020 4:41:14 PM

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To Whom It May Concern,

Thankyou for the opportunity to make a submission in regard to Development Application number 10-2020-81-1.

Timber Optimisation Hub, submitted on the 23<sup>rd</sup> March 2020.

I am a local Climate Activist but not a member of any political party, and I write as a very concerned individual. I am opposed to this DA being approved.

I understand that on its own merits this DA is for infrastructure, but I would like Bega Valley Shire Council, BVSC to view this more broadly and consider the implications of agreeing to any further development or expansion of the Eden Chipmill.

The Bega Valley Shire Council is a forward thinking council, making good plans for our future;

- It recently voted in favour of acknowledging that we are in a Climate Emergency.
- It has a Climate Action Strategy.
- It has a draft Climate Resilience Strategy.

Bega Valley Shire has had to endure, and is still trying to recover from unprecedented fires; March 2018 Tathra fires, August/September 2018 Yankees Gap fires, and most recently the horrific 2019-2020 Bega Valley fires.

In addition there is increased coastal erosions, increased temperatures, and recent and current devastating drought- all influenced by the climate changes.

I have lived at Mogilla for the past nineteen years, although I first moved to the Bega Valley in 1985. The Yankee Gap fires was a week where, in winter we saw temperatures 10 degrees higher than average, snow and 100km per hour winds.

There is a growing urgency in Australia for halting Native Forest Logging to assist in climate change mitigation.

Due to the recent fires 80% of SE forests available for logging were burnt, habitat was lost, ecosystems significantly damaged, wildlife severely impacted, and for some animal species their recovery is unclear.

Professor David Lindenmayer, The Fenner School of Environment and Society, Australian National University and Doug Robinson, Honorary Visiting Fellow, Department of Ecology, Environment and Evolution, La Trobe University, wrote in 'The Conversation ' March 2<sup>nd</sup> 2020; "Research indicates that post fire logging is the most damaging form of logging".

"Forests logged after fire have the lowest bird biodiversity relative to other forests, including those burnt at high severity (but which remain unlogged)."

"Soils remain extensively altered for many decades after post-fire logging. This is a major concern because runoff into rivers and streams damage aquatic ecosystems and kills organisms".

The Bega Valley Shire Council has a unique opportunity to start the long road to ceasing large scale forest logging operations in this region.

I understand how difficult this would be, given our long history of traditionally supporting the Eden Chip Mill.

I understand that there would be loud and emotive opposition to declining this and future Chip Mill DA's.

However;

- A moratorium on Native Forest logging in Australia is gaining momentum.
- The Victorian Government has moved to ban all logging in the State of Victoria, with Old Growth logging now illegal and an end to Native Forest logging by 2030.

- Climate Change is happening quicker than anticipated, and with the COVID-19 Pandemic we have a chance to reset our plans and goals.
- The Bega Valley people and landscape have been severely traumatised by recent fires and we still need to prepare for future long fire seasons.
- There is a National appetite for Climate Action and the Bega Valley could become a national leader in resetting the Australian agenda and landscape.
- Business opportunities could include ecotourism, small scale cottage timber industries, forest repair and management, fire mitigation work and so much more.

Thankyou for this opportunity and I wish you all, all the best in your difficult deliberations on this critical matter.

Warm Regards,

[REDACTED]  
[REDACTED]

MOGILLA, 2550

Mobile [REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Saturday, 9 May 2020 7:57:20 PM

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• Dear Councillors,

I write with concern that the Eden chip mill may be expanded.... please know that myself and my family strongly oppose this !

- This proposal will set the scene for expanding the woodchipping and exploitation of the forests of the South Coast and East Gippsland, even though this industry is known to be a financial and environmental catastrophe
- Approval of this project would make the needed transition to plantation forestry harder and create incentives for intensifying native forest logging despite the Victorian move to ban this industry and the strong public opinion against its continuation
- The DA does not accurately reflect the air quality, noise impacts, water resources and quality and motor vehicle traffic because it only considers the chipmill sites and ignores the rest of the supply chain necessary to keeping it running
- The devastating impact of the summer fires mean that we should be closing the chipmill not expanding it. The impacts of native forest logging are significant and not sufficiently addressed in the application. During the devastating summer fires 80 percent of the forests available for logging in the South East were burnt and across the country an estimated one billion animals were killed. The forests must be allowed to recover. Now is not the time for expanded logging, but for a moratorium.
- The proposal is inconsistent with climate change mitigation strategies and will see the release of significant carbon stores into the atmosphere.

Regards,

[REDACTED] Tanja

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Submission regarding the Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Wednesday, 6 May 2020 4:01:23 PM

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Dear Bega Valley Shire Council,

I am writing to not support the development application (DA) from Allied Natural Wood Exports. The development will make this one of the biggest native forest sawmills in Australia, processing 60,000 m<sup>3</sup>p/a. Ninety six percent of hardwood sawmills in Australia are less than 45000 m<sup>3</sup>pa throughput ([ABARES 2019](#)). The DA includes the 'Biodiversity and EPBC Act Protected Matters Report', however it 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 before fire, and if further logging occurs due to approval of this development, then we will see highly significant impact on threatened species (i.e. local extinctions). Thus I do not support this development and believe it should be rejected.

Kind regards,

[REDACTED]

[REDACTED]

PhD Candidate  
Centre for Sustainable Ecosystem Solutions  
School of Earth, Atmospheric and Life Sciences  
Faculty of Science, Medicine & Health  
University of Wollongong NSW 2522 Australia

13<sup>th</sup> May 2020

[REDACTED]

[REDACTED]

Brogo

Dear Bega Valley Shire Councillors

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

I am writing to lodge my objection to the above proposal lodged by Allied Natural Wood Exports (ANWE). In a dramatic year that has seen the Bega Valley Shire Council acknowledge the climate crisis by the adoption, with community support, of a Climate Emergency Declaration and possibly the most widespread and intense wildfires in our nation's history, approval for this application is not only a denial of what the science is telling us about climate, forest management and maintaining a sustainable eco-systems but given the parlous state of our community's environment, isn't just tone deaf it is unconscionable.

According to the DA the proposed sawmill would only employ 20 people even though Blue Ridge Hardwoods, which this mill in effect replaces, employed 55 people in 2019. As the mechanisation of the industry continues the jobs argument gets shakier and shakier, particularly as these jobs are based on destruction that forest ecologists (David Lindenmayer, ANU; Doug Robinson, La Trobe; Chris Taylor, ANU; Philip Zylstra, Curtin University....) are telling us is not sustainable. But despite the dramatically shrinking number of jobs this sawmill would be considerably larger than 96% of Australia's hardwood sawmills.

The science around the necessity of habitat for the native animal inhabitants of our place is no longer contentious but what is becoming more a part of our knowledge is that thriving biodiverse environments are also necessary for human thriving. The science is now clear; forest destruction adds to carbon dioxide emissions because older forests retain more carbon; degrading and logging forests greatly increase the risk, and severity, of wildfires; logging degrades water catchments; reducing forest cover reduces long term rainfall due to reduced transpiration.

ANWE will talk about this DA in terms of economic investment but even this argument is questionable. If approved this DA would enable ANWE to establish a monopoly over every log produced in the Eden region and the resulting Wood Supply Agreement would lock in the use of native forest for the foreseeable future which would effectively stop any transition to plantation timber.

Yours Sincerely

[REDACTED]



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Wednesday, 13 May 2020 7:26:07 PM

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Dear Bega Valley Councillors,

Please do not expand Eden Valley chipmill into native forests, right now our native forests are more valuable than ever!

Bega Valley is an area of great natural beauty and should be protected. Woodchipping is known to be a financial and environmental catastrophe, and the public strongly oppose destroying native forest, Victoria have moved to end this practice.

The DA does not accurately reflect the air quality, noise impacts, water resources and quality and motor vehicle traffic because it only considers the chipmill sites and ignores the rest of the supply chain necessary to keeping it running.

The devastating impact of the summer fires mean that we should be closing the chipmill not expanding it. The impacts of native forest logging are significant and not sufficiently addressed in the application.

During the devastating summer fires 80 percent of the forests available for logging in the South East were burnt and across the country an estimated one billion animals were killed. The forests must be allowed to recover. Now is not the time for expanded logging, but for a moratorium.

The proposal is inconsistent with climate change mitigation strategies and will see the release of significant carbon stores into the atmosphere.

Sincerely,

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Eden Chipmill DA  
**Date:** Wednesday, 13 May 2020 10:45:23 AM

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

I am strongly against this DA being granted.

We have just gone through a horror summer with climate change fuelled mega bushfires which have burnt 80% of our native forests and killed billions of animals and this DA seeks to make matters worse.

- 1) It is continuing to support logging native forests when we need to be encouraging moving rapidly to plantation timbers so that we can be drawing carbon out of the atmosphere. It is continuing to support an industry that is unprofitable without government support instead of transitioning workers to new jobs.
  
- 2) The “Biodiversity and EPBC Act Protected Matters Report” was written before the bushfires and ignores the impacts of them.
  
- 3) Logging increases the ferocity of bushfires according to researchers scientists David Lindenmayer, Robert Kooyman, Chris Taylor, Michelle Ward and James Watson. This occurs because logging leaves debris at ground level that increases the fuel load in logged forests. It also changes forest composition and leaves these areas of forest both hotter and drier.
  
- 4) BVSC has declared a climate emergency and yet is proposing to act in a way that climate science says is the opposite of what it needed to mitigate and adapt to climate change.

[REDACTED]

# WOODCHIP MILL SUBMISSION

[REDACTED]  
Cobargo  
NSW 2550

Email address: [REDACTED] m

Phone: [REDACTED]

Preferred means of contact: Email

Date: 13th May 2020

## **to Bega Valley Shire Council against Allied Natural Wood Exports' new mill.**

I wish to oppose the new mill on the following grounds:

### PREFACE

The recent fires have devastated the whole of the South East region of NSW. It is a travesty to try to re-establish an industry that is outdated, uneconomic, and a blight on the environment. Government, in allowing this development, is going against all the scientific conservation advice and putting private industry ahead of the natural wellbeing of the environment, as well as society's wellbeing. The "jobs" issue is recognised but the industry employs only a small number of people who could be employed elsewhere if there was a change in attitude. (see later in submission)

I am surprised that such a re-building and expansion request would be allowed, especially after both the fires and COVID-19. Society is now ready for a new change in vision and direction to a sustainable future.

To ignore the cause of the fires (it is scientifically proven that logging makes the fire prone areas more vulnerable) is morally reprehensible. To then allow further logging in the remaining areas of forest destroys sustainability for our future generations. Plantation timber is enough. Leave it there. Do not use our native forests to export for paper products. It is short term thinking.

This application was made before the fires. Now that the area has little native forest left, and the population has been distracted by COVID-19, it is commonsense to look at this application in a new light. Please do not resuscitate bad decisions! Government and Councils should be refashioning this post COVID-19 economy to provide jobs in different sectors. Leave this dirty market to fail.

## FIRES

See

<https://www.smh.com.au/national/logging-returns-to-native-forests-hit-by-bushfires-20200501-p54ots.html>

And

<https://www.smh.com.au/national/logging-likely-had-significant-effect-on-summer-fires-scientists-20200505-p54q2m.html>

Both the above articles express the scientific arguments against repeating the same mistakes of the past, therefore I won't list them here. It is enough to read and consolidate the articles.

Our Bega Shire community has been hit hard enough. Our native forests are precious.

## JOBS


The media concentrates on job losses suffered from the fires. This is THE opportunity to put dirty industries to bed, and put all the support behind such clean industries as solar and wind. We also have a current project underway which promises to be bigger and better than felling forests. It is called THE BUNDIAN WAY. Put our money behind this and in future years this south east area will be known throughout the world, bring the right people, doing the right thing, to our area and create more prosperity. More jobs could be created, and the wellbeing of the community will be enhanced. It just needs new thought and enthusiasm. The knowledge is already there.

Do not assume truck drivers are only truck drivers for timber. They can be trained to be part of a new enterprise. Keep in mind that very few people actually work on site.

Remember all the intelligent commentators who are hoping for a "new normal" after the pandemic. Let's be part of that. Look to a sustainable future and refuse to sanction this backward venture.

Thank you for this opportunity to submit my concerns.

Yours sincerely

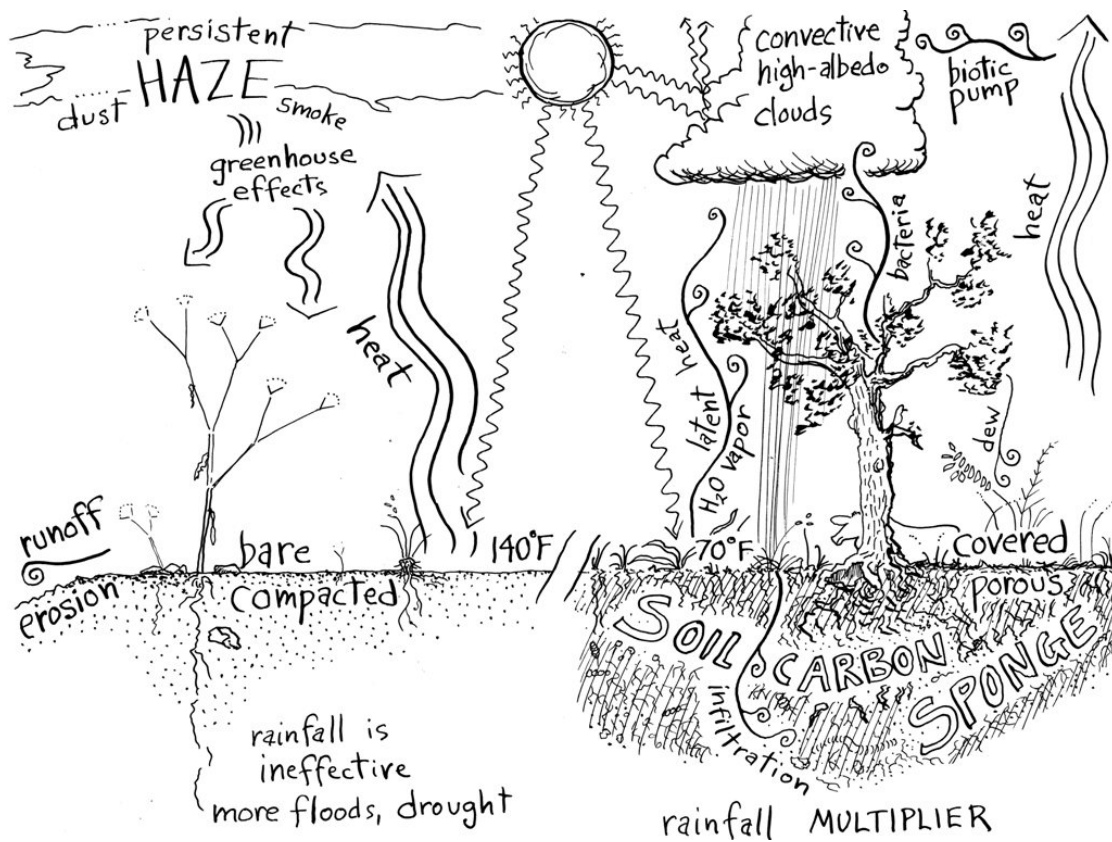
  
13th May 2020.

# “ Fires are going to be a critical determinant in our landscape.

What's happened with climate change, whole landscapes are systemically aridifying, drying. Southern Australia will get 30% less rainfall, so it'll dry, but much more worrying than just the lower rainfall is that the weather is more variable, unreliable and extreme.

With that drying, and with that extreme climate, we're going to go into dangerous fire, wildfire weather. And it's going to go beyond the capacity for fire management, conventional fire management, to control. We've already seen that. We're now getting crown fires, we're getting fuel volatilising, and burning in the crowns, well ahead of any fire fronts, impossible to put out on an extreme day. ”

-Walter Jehne



**Hello, you're listening to Earth Matters. Earth Matters brings you environment and social justice stories.**

## Bec Horridge

Today's story was produced in the studios of Radio 2XX, Canberra, on the lines of Ngunnawal and the Gambrey peoples, for Radio 3CR in Melbourne, Wiradjuri country, and broadcast nationally on the Community Radio Network. I'm Bec Horridge.

## Bec Horridge

Today I'm talking to soil scientist, Walter Jehne, and campaigner Cindy Iritz. Now they're two climate activists who've been in demand overseas with a proposal, how to build a global soil carbon sponge, that would soak up CO<sub>2</sub>, and save us from global warming. Cindy, how did you get involved in all of this?

## Cindy Iritz

When I retired from my career, I spent a couple of years doing action research, trying to work out where

was the best place for me to put my time and my energy to be able to make the biggest difference. And I came upon soils, and discovered that soils can, through plants, take carbon out of the atmosphere, and store them stably in soils. And I was like, "Wow, okay, this is where I need to put my time and energy." So that's what I've been doing.

## Bec Horridge

You can store carbon in soils, and plants do that. Could you explain a little bit for us?

**Cindy Iritz**

Most people understand about forests, and when forests are cleared, that carbon goes up into the sky. So basically, it's the opposite. We all learned about photosynthesis in schools. Through photosynthesis, the plants take carbon out of the sky, and it goes down into the roots, and is dripped into the soil, and then it's held securely in the soil. It's quite exciting.

**Bec Horridge**

You were invited to be part of a delegation to COP 21 in Paris. What was that?

**Cindy Iritz**

I had networks in different parts of the world, and one of these networks established an organization called Regeneration International, and they decided that they would invite delegates from all over the world to come to Paris. And I was one of those delegates.

The Paris people were starting an initiative called 4p1000, which is under the Lima-Paris accord. I was there with about three dozen other delegates. And it was amazing, mostly because we'd all been working in isolation - so the solidarity was incredible.

**Bec Horridge**

I looked up what the Four Per Thousand initiative is and found that an annual growth rate of 4% in the soil carbon stocks per year would halt the increase in the CO<sub>2</sub> concentration in the atmosphere related to human activities. The Four Per Thousand International Initiative was launched in 2015, at the COP 21 International Climate Conference. It consists of federating voluntary stakeholders of the public and private sectors.

The aim of the initiative is to demonstrate that agriculture and, agricultural soils, can play a crucial role where food security and climate change are concerned. The ambition of the initiative is to encourage stakeholders to transition towards a

productive, highly resilient agriculture, based on the appropriate management of lands and soils creating jobs and incomes, hence, ensuring sustainable development.

**Walter Jehne**

We're at this position now, after 50 years of hard evidence, that CO<sub>2</sub> is going up, and increasing. And we're in a position now where CO<sub>2</sub> will continue to rise. And drawing down, or just slowing down emissions, or even politically pretending to slow down emissions is nowhere near enough. And so, it's not just a matter of slowing emissions. We still must do that, but we also must and can draw down massive quantities of carbon naturally back into the soils and the biosphere.

Up to now we've completely ignored the potential of our residual natural biosystems to draw that down, but if we stop ignoring that, and start enhancing that, yes, we can draw down twice as much carbon as we are now annually emitting into the atmosphere. And that really is imperative for the climate, globally, in the next decades, we haven't got much time.

**Bec Horridge**

Building up our soils with carbon could draw down a massive amount of CO<sub>2</sub>. I'd like to dig into the science a little more. What are soil microbes? What do they do?

**Walter Jehne**

Soil microbes are really the active agents. They're really the front-line soldiers or activists that are working right across the planet, have been doing that for 420 million years. And they're the things that sequester that sugar, and the root exudates that Cindy mentioned, and store that sugar as stable soil carbon.

In doing so, they build that soil carbon sponge, that loose, fluffy, aggregated soil, that is able to hold water and nutrients and drives a whole productivity of all our bio-systems. It's that soil carbon sponge that holds the water, allows rain to infiltrate, and be retained, and of

course it's that hydrology that governs 95% of the heat dynamics of the blue planet, Earth. And it's that hydrology that we must now restore to safely, naturally cool the planet.

**Bec Horridge**

I read that biological agriculture that puts carbon back in the soils can give us healthier food. Can you please explain?

**Walter Jehne**

Every living organism on this planet needs nutrients. It needs those nutrients for total biochemistry, for its health. We need in the excess of 30 different nutrients in the right concentration, forms, ratios and balance. And we get those nutrients naturally, from our soils. The things that make those nutrients available in the right concentration ratios, forms and balances are the microbes, the fungi that are involved with taking up those nutrients, and then transporting them to plants, in exchange for the sugars that Cindy mentioned, the plants are exuding. The health of our food, and the health of people, then depends on - are we getting these right nutrients? We can only get those nutrients if we grow food in these natural ways, from these natural soils. Otherwise we're dependent on fertilizer nutrients, and invariably we have hyper concentrations of some, and deficiencies in others, and that's causing massive disease consequences right across modern humans, because the whole nutritional integrity of our food is fundamentally compromised.

**Bec Horridge**

What sort of diseases are you thinking of there?

**Walter Jehne**

Well, over the last 60 - 70 years, we've had an explosion of a whole range of self-induced diseases. These are diseases which are really our biochemistry malfunctioning. And that includes the cancers, the cardiac heart diseases, the autoimmune, the

whole range of diabetes, the whole range of diseases that are-

### **Bec Horridge**

Attention deficit disorders?

### **Walter Jehne**

Yes, attention deficit, allergy reactions. But these are all diseases that directly relate to what we put into our bodies through our food. And if the nutritional integrity of that food is compromised, by definition, so is our biochemistry, and so is our preventative health. We've had this massive exponential explosion, where two-thirds of the community globally are now either obese or malnourished. And that's all related to the lack of nutritional integrity of our food, and how we've destroyed that through agriculture, because of our destruction of healthy soils. We have globally a \$10 trillion a year global industrial food system. It wants to produce its products and the cheapest possible way. It's not really interested in our health, because it makes even more money on then fixing the symptoms of that lack of nutritional integrity in what we're eating.

If you go to a supermarket and 98% of the shelf spaces are from these nutritionally poor products. And invariably, that's what people are buying. Trillions of dollars of marketing money is being spent on to induce us to buy that stuff. There are impediments there, there's vested interest. It's a, as Cindy said, a very challenging, difficult area.

### **Bec Horridge**

How exactly are you proposing to produce healthier food in Australia?

### **Walter Jehne**

Working with groups of, or individually, with innovative farmers all over Australia and regions. They're already doing it, but then really saying, "Here is a natural way. Here's a healthier way that we can regenerate those soils, grow better crops with far fewer artificial inputs." And in so, doing by it through these

natural processes, produce healthier food. And so, our challenge now is to say, "Okay, how do we work with individuals, groups, and how do we help them to do that at that local level, get into markets, to get those products as high premium, high nutritional integrity products, into markets at the premiums that they deserve?"

### **Bec Horridge**

Walter made the change to regenerative agriculture sound so easy, but Cindy could see some obstacles.

### **Cindy Iritz**

Farmers who put themselves forward and try new things get ostracised within their community. There's a thing which is known in our field as 'the Hundred Mile Rule', where, within a hundred miles of your farm, everybody thinks you're a fool, and nobody wants to know you.

Socially, you're ostracised. And you imagine how difficult this makes farming. which is a traditional industry. Relationships are obviously very deep in rural areas - terribly hard.

What we've just been doing is working with those innovators, giving them credibility, giving them support. This has made a big difference. There's more produce and products being required for export, that means that more land is getting regenerated.

The original story of the carbon being taken out of the atmosphere is stored in the soil. The more regenerative agriculture, the more exports that are happening of regenerative agriculture, the better chance of us getting closer towards saving the planet one day.

### **Bec Horridge**

Walter, we know that there's been fires all over the place. When you see litter on a forest floor, dead branches and things, what do you think of?

### **Walter Jehne**

Fires are going to be a critical determinant in our landscape. What's

happened with climate change, whole landscapes are systemically aridifying, drying. Southern Australia will get 30% less rainfall, so it'll dry, but much more worrying than just the lower rainfall is that the weather is more variable, unreliable and extreme.

With that drying, and with that extreme climate, we're going to really go into dangerous fire, wildfire weather. And it's going to go beyond the capacity for fire management, conventional fire management, to control. We've already seen that. We're now getting crown fires, we're getting fuel volatilising, and burning in the crowns, well ahead of any fire fronts, impossible to put out on an extreme day.

We need to rethink the whole basis of fire management. We must do it. It's critical, but we need a whole new paradigm of approaches. And it's again, very, very simple, and it's what happens naturally. We have photosynthesis that produces biomass. Green plants grow and produce biomass, which is cellulose and lignum, woody tissue. Balancing, balancing growth, the plant growth, biomass production, there's an equal balancing function in nature, which is biodegradation. The rotting down of that biomass, largely by fungi, and bacteria to turn that fuel into stable soil carbon.

### **Bec Horridge**

You're with Earth Matters. I'm Bec Horridge. And I have in the studio with us today, Cindy Iritz, who's a logistics expert, and Walter Jehne, a soil scientist.

### **Walter Jehne**

Every piece of biomass that's ever formed on land, for the last 420 million years on this planet, has either burned back to CO<sub>2</sub>, or oxidized back to CO<sub>2</sub>, or been converted into stable soil carbon. It's that balance between burning and stable soil carbon formation, which we control through our land management.

It's fungi that are the dominant factor in biodegrading it, so it's not there in fuel.

We've got a whole new, amazing, powerful opportunity to say, "Look, can we actually biodegrade the fuels, so as to avoid those dangerous fire periods?" And the answer is, "Yes, we can. We can do that practically readily." Instead of having five to 10 tonnes of fuel per hectare accumulating every year in our forest, leading to extreme catastrophic wildfires, we can turn that five to 10 tonnes of biomass into soil carbon, which will then hold water, increase the moisture retention of that soil, and change the fire risk. Both by reducing the fuel and maintaining higher soil moisture levels.

In turning from a dry, sclerophyll, extreme habitat, that same forest - we can turn into a moist, amazing sheltered, more wet sclerophyll environment. This is fundamental Australian ecology, that was described way back in the 60s, by Beadle, and [name?]. We have wet sclerophyll forest, and dry sclerophyll forest, from the same soils, in the same climate, with the same species. What's needed to turn it from a dry sclerophyll, fire-prone environment into a wet sclerophyll, more rainforest inducing environment? That is the activity of these fungi - we can control those, we can enhance those, and in that way, preventatively reduced fire risks.

### Bec Horridge

How does this relate to water? Friends of mine from different places in New South Wales are saying their local creeks and rivers have gone dry. Can you talk to that - the drying of rivers, and that the landscape is so dehydrated?

### Walter Jehne

It's a critical symptom of what's happening in the landscape with climate change. We get less rainfall. It becomes more critical that instead of worrying about that we've got less

rainfall; we've got to focus on what happens to every one of a hundred raindrops that do fall.

Does it infiltrate the soil, to recharge the soil carbon sponge, our in-soil reservoirs, and keep that landscape green and functioning - keep subsoil water recharging streams and springs, to keep the rivers flowing? Or do we allow that surface to become so compacted, so degraded, that 95% of those raindrops that do fall, just rapidly run off, in erosive flood flows, and invariably cause drought as a consequence? Drought isn't anything to do with the weather, per se. Drought is all about our mismanagement of our landscape. We've prevented those hundred raindrops that do fall, staying in the landscape, to keep that landscape green and healthy.

### Bec Horridge

And by cutting down so many trees, we've affected the hydrology cycle too, haven't we?

### Walter Jehne

We have fundamentally changed that soil hydrological cycle, because of our agricultural land management practices. As we clear the land, cutting down trees, as we burn the land excessively - indigenous fires were a completely different story. They were cool mosaic burns, largely by women, that managed the surface fuel level, but didn't degrade the soil. Ours are degrading the soil. Clearing, burning, cultivation, overfertilization, biocide use, which kills that soil microbial life, and bare fallows, are all extremely impacting on our soils, degrading, destructuring them, compacting them - causing most of this water to run off. As far as the whole hydrology of the landscape, it's making sure that every one of those a hundred raindrops infiltrates, is retained, rather than running off. And we can do that by changing our land management practices.

### Bec Horridge

That's great, Walter, but you didn't really explain what I wanted to know.

How do you get fungi - how do you get them to eat more forest litter? How do you make more fungi?

### Walter Jehne

We'd just go back to nature because nature had beautifully balanced systems for doing this. It all revolves around the carbon-nitrogen ratio in that forest litter. If we have dry eucalypt litter, particularly as we have now, it's got a carbon nitrogen ratio of over 100 to one. There's so much carbon, there's so little nitrogen in that litter, it's almost impossible to break down. It accumulates to create these dangerous fire weathers. In nature we had a lot of animals and biodiversity in those forests. These animals were important in incorporating that nitrogen, and turning around that litter, to accelerate its breakdown. Let's go through that. We had koala bears and the crown turning eucalypt leaves into, basically frass, which was urine and excrement. Koalas, you could class them as aerial alimentary canals.

They were eating prodigious quantity of eucalypt leaves, excreting the nutrient as nitrogen litter, adding nitrogen to the forest floor in the urine and excrement, to help drive the breakdown of that litter.

We had vast quantities of leaf eating insects eating eucalypt leaves, turning 50% of that leaf into insect protein, and another 50% into excrement. Nitrogen that rained down on the forest floor helped break down that litter. We had bandicoots and potoroos and pademelons, little marsupials on the forest floor, continually digging for truffles, fungal fruiting bodies.

Every night, each little potoroo would dig up 150 little holes. On a yearly basis, zoologists have studied, they moved six tonnes of topsoil a year per pademelon.

Disturbing that forest floor, composting, accelerating that compost floor, putting extra nitrogen in.

We had lyre birds, what we called scratchable scrub turkeys, bush



turkeys, scratching through that litter, continually excreting in that litter, accelerating its composting to stable soil carbon. There was a myriad of biological life, all those beautiful fairy little animals, birds, and it was that biodiversity life that added nitrogen to the fuel, brought the carbon nitrogen ratio down to about 20 to one, not one hundred to one. At 20 to one, that litter breaks down rapidly to stable soil carbon, to build the sponge, to build its water holding capacity, and turn what were dry sclerophyll forests into progressively wet sclerophyll forest. Now you can see this, for those people who ever visited the South Coast of New South Wales, where we had spotted gum forest on very dry gravelly soils. In the same climate, those spotted gum forests can either be very dry, very fire prone, or where they have enough nitrogen, with their macrozamia communis understories, and these animals turning into effectively wet sclerophyll, for pre-rainforest conditions. It's as simple as accelerating the breakdown of that litter, to reduce the fire fuel, both through moving the fuel, and enhancing soil moisture.

### **Bec Horridge**

What are you going to do? Like, sprinkle fungi food on there? How do you do that, with vast areas of forest? It seems like a bit of a call.

### **Walter Jehne**

Of course, we don't sprinkle fungi around - there's no such thing, they're already there. We must now manage the forest, we must respect and restore the biodiversity, the animal diversity. We understand these animals in the forest are critically part of the ecology. We must start looking at these forests, not just as trees and timber, but as a living functional, dynamic biosystem with these nitrogen cycles, avoiding the fire.

It's respecting, restoring the ecological biodiversity of those forests. On top of that, we can do a lot of preventative work. We can have biological firebreaks, where we again can put natural nitrogen onto road edges, and accelerate the breakdown of litter, creating biological firebreaks in those forests. We can do a whole lot of basic land management changes that limit the amount of fuel. We can stop the fires crowning, going up into the crowns, where they become unmanageable and uncontrollable, and extremely dangerous.

### **Bec Horridge**

Walter Jehne and Cindy Iritz, from Regenerate Earth, talking on the global soil carbon sponge. You've been listening to Earth Matters.

**This edition of Earth Matters was produced for Radio 3CR in Melbourne, on Wiradjuri country, and broadcast nationally on the Community Radio network.**

**Earth Matters would like to thank the Community Broadcasting Federation for their generous financial support.**

**And if you'd like to get in touch with the Earth Matters team, you can e-mail us, at [earthmatters3cr@gmail.com](mailto:earthmatters3cr@gmail.com), or visit our Facebook page on [earthmatters3crradio](https://www.facebook.com/earthmatters3crradio). Or follow us on Twitter, at [@EarthMradio](https://twitter.com/EarthMradio).**

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**The Earth Matters team will be back next week with more environmental and social justice stories, from all over this beautiful blue planet.**

**I'm Bec Horridge. That amazing music we've been listening to is the music of Dar Shelton, and that song, [Encounter By The River](#).**

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Cc:** [REDACTED] [u](#)  
**Subject:** Eden Woodchip Mill proposed DA  
**Date:** Friday, 8 May 2020 1:25:04 PM

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[REDACTED]  
[REDACTED]  
Broulee, NSW, 2537

May 8, 2020

Dear Ms Barnes and Mr Constance,

If approval is granted to Allied Natural Wood Exports (ANWE) to build a new sawmill, pallet plant and briquette plant, it will be one of the biggest native forest mills in Australia.

The Eden wood chip mill has already been decimating large areas of native forests and releasing large amounts of carbon into the atmosphere with its wood chipping.

Science tells us that intact forests are not only one of the most effective carbon storers, but also our best oxygen and rain producers, temperature and land stabilisers. Our native forests are also home to a biodiversity of plants, birds and animals. Tragically a million native animals were destroyed during the 2019-2020 catastrophic bushfires.

Scientists such as Professor James Watson, a conservation scientist at the University of Queensland maintains "that Logging takes away big trees and allows wind and sunlight into the system....as a consequence these areas become far drier, and because you have removed the tall trees, lots of young saplings come up and they're very flammable."

If we continue to log what's left of our native forests we will increase the chances of bushfires of the magnitude of the 2019-2020 fires occurring in this area more frequently.

From an employment perspective, approval of the DA will slash jobs in saw milling from 55 to 20.

With this approval would come a monopoly buyer for all logs produced in the Eden Region and the Wood Supply Agreement would lock in the use of native forest wood for at least another decade.

With almost 80% of South Coast forests burnt, we need to be growing forests not destroying them, and transitioning to plantation timber as soon as possible.

I strongly object to the proposed DA that ANWE has before Bega Valley Shire Council. If BVSC are serious about declaring a climate emergency then this development needs to be stopped.

Thank you for your time,

Regards,



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** objection to DA 10-2020-81-1 "Timber Optimisation Hub"  
**Date:** Wednesday, 13 May 2020 1:28:32 AM

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

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

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

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

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

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

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

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

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

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

and State into the devastating fires of the recent summer and their findings should help inform consideration of this DA.

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

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

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

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

██████████  
██████████

Doctor George Mountain

13/05/2020

Sent from [Mail](#) for Windows 10

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Eden woodchip mill  
**Date:** Saturday, 16 May 2020 6:41:47 PM

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Dear Council,

I am writing to express my deep concern about the Eden wood chip mills plans to rebuild and expand. Please consider in these times of desperate need for positive action on climate change mitigation that allowing destruction of our precious remaining native forests would be sending a message to our children of the Bega Valley that we don't care about their future.

Please do not allow these plans to proceed.

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Cc:** [bega@parliament.nsw.gov.au](mailto:bega@parliament.nsw.gov.au)  
**Subject:** Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Wednesday, 13 May 2020 10:39:39 AM

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To whom it may concern,

I was passed on the below information regarding the development of this wood chip mill. I am appalled that this is being considered, in light of the huge amount of native bushland lost this summer as well as the emerging effects of global warming.

I cannot fathom how you could approve this, not only would it contribute to global warming through the carbon released, but it would also largely restrict our regions ability to counteract this by limiting the amount of trees able to absorb this carbon.

And for what?! 20 jobs? Surely our community could be investing in industries which provide more jobs, have a more positive environmental impact and do not take away from our already struggling native fauna and flora.

There are some serious ethical and environmental problems with this development, I sincerely hope these are at the forefront of your consideration a decision is being made.

If this is approved I would like a detailed explanation of how you can justify this, and what efforts you will be making to counteract the negative effects i.e. carbon offsetting through a tree planting program.

Regards,

[REDACTED]

(resident of the electoral district of Bega)

## **Timber Optimisation Hub, Development Application ([10-2020-81-1](#))**

### **Submission to Bega Valley Shire Council**

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. 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 over logged.

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.

Jobs will be lost in local sawmilling. In 2019 Blue Ridge Hardwoods, with 55 employees lost the Eden sawlog Wood Supply Agreement to the woodchip mill and is now in the process of closing. The mill will employ 20, according to the DA.

This DA would allow 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.

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

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.

This proposal stops a transition to plantations for the wood chip 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.



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Community submission - Allied Natural Wood Exports application  
**Date:** Sunday, 10 May 2020 1:46:55 PM

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To the Bega Valley Shire Council,

This submission is in relation to the approval for Allied Natural Wood Exports to build a new sawmill, pallet plant and briquette plant. We sincerely ask, for the good of the community and its human and nonhuman inhabitants, that you do not approve this application.

There are many reasons for this request. The proposed developments would perpetuate logging of native forest. This is an issue of existential import not only to the local wildlife but to the local inhabitants: as discussed in a recent article published in *Nature Ecology & Evolution*, 2020, logging increases the landscape's susceptibility to bushfires. Logging causes a rise in fuel loads, increases potential drying of wet forests and causes a decrease in forest height. This leaves 450 tonnes of combustible fuel per hectare close to the ground. In seasonally dry landscapes, as we've already seen earlier this year, this is a disaster waiting to happen.

As a result of these 2020 bushfires, our South Coast forests cannot support added pressure. Over 80% of South Coast forest were lost in the summer, and the remaining forest is habitat for some of the nation's most imperilled species. Now more than ever this needs to be seen as part of the equation, considering the recent bushfires killed over a billion animals nationally.

At a broader level, approving this proposal would fly in the face of the Bega Valley Shire's Climate Resilience Strategy. At this stage, it simply shouldn't need explaining that logging contributes to climate change. Deforestation releases stored carbon into the atmosphere as carbon dioxide – both logging, and the bushfires that it helps to create, will increase the amount of free carbon in the atmosphere. Declaring a climate emergency will be mere lip service if the Council approves this application, creating one of the biggest native forest mills in Australia.

Logging also directly impacts soil and hydrological cycles, as the reduction in tree cover leads to increases in water runoff and soil erosion. The degradation of water systems is something which affects us all. Despite the environmental guidelines set in place, there are regular breaches: for example, the Forestry Corporation of NSW recently received a warning for breaching a number of environmental regulations in its operations at Tantawangalo, including failing to implement appropriate stream side buffers. The policing of such breaches are inadequate: formal warnings and fines don't regenerate banks.

This will have ramifications for the industry for many years to come. The approval will oversee the creation of a monopoly buyer for every log produced in the Eden region. Furthermore, the Wood Supply Agreement, which requires the approval of this DA, will lock us into the use of native forest wood for another 10 years, with 5 yearly extensions after that, significantly slowing down the transition to plantation logging. This is a regressive move for the industry.

The proposal may also have economic consequences. The development is at odds with the South Coast's regional identity, and how we wish to promote ourselves. Our economy is

highly dependent on tourism, and even beyond the impact on air quality, noise quality, and large vehicle transport, being home to one of the nation's largest sawmills of native forest is antithetical to our image of "magnificent wilderness" (a phrase used in a local tourism brochure). Often, community support for such ventures is founded on the wish to support local jobs. However, approving the DA will mean a reduction in jobs: 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. We hope you will take these considerations into account when making your decision.

Thank you for your time,

[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Allied Natural Wood Exports D.A. for Eden Chipmill - Submission  
**Date:** Friday, 8 May 2020 2:15:27 PM  
**Attachments:** [page1image12504.png](#)  
[page1image12664.png](#)  
[page1image12984.png](#)

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General Manager, 8 May 2020

Bega Valley Shire Council.

Dear GM Barnes,

Please accept our submission of objection for the below D.A.

## **Timber Optimisation Hub, Development Application (10-2020-81-1) 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 m<sup>3</sup>p/a. Ninety six percent of hardwood sawmills in Australia are less than 45000 m<sup>3</sup>pa 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](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.

Yours Faithfully,



Bermagui

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Tuesday, 5 May 2020 7:56:42 PM

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Dear Sir/Madam, please consider this a submission re. the timer optimisation hub, development application (10-2020-81-1).  
After more than 80% of South Coast forests were burnt in the summer bushfires, the forests of our region simply cannot support this. Please do not enable the further extinctions and biodiversity loss that this chipmill expansion would create. Please see the points below for clarification, yours sincerely, Keri James.

- **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 m<sup>3</sup>p/a. Ninety six percent of hardwood sawmills in Australia are less than 45000 m<sup>3</sup>pa throughput. - [ABARES 2019](#))

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

- **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](https://www.forestrycorporation.com.au/_data/assets/pdf_file/0006/1214637/allied-natural-wood-exports-pty-ltd-hardwood-forests-sawlogs.PDF)

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

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

- **The 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.

- **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.

- **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.

- **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.

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Objection to the Eden Woodchip Mill DA Approval Process  
**Date:** Wednesday, 13 May 2020 9:56:15 PM

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To the Bega Valley Shire Council,

I am writing this submission as I object to the proposed rebuilding of the Eden Woodchip Mill. Not only will it provide a very small number of jobs (~20 compared to Blue Ridge Hardwoods 55 jobs lost due to forced closure from the loss of the Eden Sawlog Wood Supply Agreement in 2019), but it will give unprecedented and unrestricted access to State Forest and our essential and vulnerable native forests so heavily impacted in the recent bushfires.

We know the importance of having unimpacted native forest for ecosystem functioning to supports both animal and human life as we know it. It is unconscionable, in this day and age and with the knowledge we have that we should open our native forests up to becoming woodchips under an ill-informed Wood Supply Agreement. We should instead be investing in the move to plantation forests into the future, and leaving our native forests to regenerate to provide essential habitat and ecosystem services that we rely on, and that make this part of the world such a beautiful one.

Keeping in line with the Bega Valley Shire declaration of a climate emergency, and the creation of a Climate Resilience Strategy, this DA should not be approved in it's current format. With the acknowledgment of a climate emergency by the Bega Valley Shire approval of this DA that treats climate as a non-issue is counter-productive, unethical and possibly illegal. In addition to that, the DA does not acknowledge the impact the summer bushfires have had on the proposed supply forests.

I henceforth call for the denial of this DA and so in turn the Wood Supply Agreement that would decimate the remaining native forests we have left to us. We should be custodians of these beautiful places, not destroyers.

Be remembered as the Council that did the right thing for the environment and the people of the Shire, and paved the way for sustainable forestry and local jobs by investing in plantations, not unchecked native logging.

Sincerely,

A Concerned Resident of the South Coast,

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Tuesday, 5 May 2020 2:57:56 PM

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

### Submission to Bega Valley Shire Council

I oppose any further development of Eden Woochip Mill.

In fact I support the CLOSURE of this blot on the landscape and environment, and have done so for 30+ years.

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 m<sup>3</sup>p/a. Ninety six percent of hardwood sawmills in

Australia are less than 45000 m<sup>3</sup>pa 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-naturalwood-](https://www.forestrycorporation.com.au/_data/assets/pdf_file/0006/1214637/allied-naturalwood-exports-pty-ltd-hardwood-forests-sawlogs.PDF)

[exports-pty-ltd-hardwood-forests-sawlogs.PDF](https://www.forestrycorporation.com.au/_data/assets/pdf_file/0006/1214637/allied-naturalwood-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

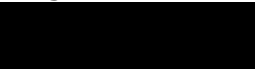


written before the fires, but no meaningful changes were made to reflect the damage done. In the summer bushfires, 80 percent of the forests available for logging were burnt. An estimated one billion animals were killed. The forests of the region were already overlogged and there are serious doubts about 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.

RegARDS



Pambula Beach  
2549

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Eden wood chip mill extension application.  
**Date:** Wednesday, 13 May 2020 11:11:55 PM

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To the General Manager, Bega Valley Shire Council, Bega.

I am writing to oppose the above application on environmental grounds, relating especially to the effect logging has on burnt forest and the findings of the the report "Biodiversity and EPBC Act Protected Matters Report".

I am a resident of Eurobodalla but do not wish to see any of our forests logged for wood chips for export. We are very fortunate to live in an area where there are forests and natural areas. Forests are a valuable resource and not just for timber. Science tells us that forests are the lungs of the earth and that we rely on them. It also tells us that the loss of forests is worsening climate change.

This summer the moisture content of soils and foliage was at a record low. This is leading to the increase in catastrophic fire events as we have already experienced. Pyrocumulonimbus which were once considered rare, occurred frequently in these fires with devastating effect.

It would seem to be madness to continue to do the things that create these conditions and to allow climate change to accelerate with the ultimate impacts on our own lives. As a result of the summer bushfires, we saw some 80% of South Coast forests burn. In addition we saw the loss of millions of wild animals and their habitat and food sources. It is essential that we rehabilitate and retain natural forest and habitat. Once it is lost it is impossible to replace the diversity of life that these areas support. Management of the forests for other than financial gain is essential.

Surely it is also essential that the above mentioned report be used to guide any development of this sort. If nothing else the application needs to fully address the issues of climate and environment before it can even be considered and If it does not confirm to required standards it should be refused.

Instead of destroying more forest we need to look at ways to reverse the drying of our continent. The health of our environment matters and, as the bushfires indicate, we are reaching uncharted territory in our interaction with the climate and our own viability on this planet.

Thankyou,

[REDACTED]  
Moruya



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Eden mill  
**Date:** Wednesday, 13 May 2020 9:25:17 PM

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Please consider that our forests are lungs for our planet. Cheap chips can't replace our beautiful heritage and rare natural landscapes. The mill should not be expanded or subsidised to pretend it's a job creator. Invest and future proof our south coast with clever energy ideas and technologies as revere our potential as the natural food hub that it is.

Sent from my iPad

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Community submission - Allied Natural Wood Exports application  
**Date:** Sunday, 10 May 2020 1:46:55 PM

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To the Bega Valley Shire Council,

This submission is in relation to the approval for Allied Natural Wood Exports to build a new sawmill, pallet plant and briquette plant. We sincerely ask, for the good of the community and its human and nonhuman inhabitants, that you do not approve this application.

There are many reasons for this request. The proposed developments would perpetuate logging of native forest. This is an issue of existential import not only to the local wildlife but to the local inhabitants: as discussed in a recent article published in *Nature Ecology & Evolution*, 2020, logging increases the landscape's susceptibility to bushfires. Logging causes a rise in fuel loads, increases potential drying of wet forests and causes a decrease in forest height. This leaves 450 tonnes of combustible fuel per hectare close to the ground. In seasonally dry landscapes, as we've already seen earlier this year, this is a disaster waiting to happen.

As a result of these 2020 bushfires, our South Coast forests cannot support added pressure. Over 80% of South Coast forest were lost in the summer, and the remaining forest is habitat for some of the nation's most imperilled species. Now more than ever this needs to be seen as part of the equation, considering the recent bushfires killed over a billion animals nationally.

At a broader level, approving this proposal would fly in the face of the Bega Valley Shire's Climate Resilience Strategy. At this stage, it simply shouldn't need explaining that logging contributes to climate change. Deforestation releases stored carbon into the atmosphere as carbon dioxide – both logging, and the bushfires that it helps to create, will increase the amount of free carbon in the atmosphere. Declaring a climate emergency will be mere lip service if the Council approves this application, creating one of the biggest native forest mills in Australia.

Logging also directly impacts soil and hydrological cycles, as the reduction in tree cover leads to increases in water runoff and soil erosion. The degradation of water systems is something which affects us all. Despite the environmental guidelines set in place, there are regular breaches: for example, the Forestry Corporation of NSW recently received a warning for breaching a number of environmental regulations in its operations at Tantawangalo, including failing to implement appropriate stream side buffers. The policing of such breaches are inadequate: formal warnings and fines don't regenerate banks.


This will have ramifications for the industry for many years to come. The approval will oversee the creation of a monopoly buyer for every log produced in the Eden region. Furthermore, the Wood Supply Agreement, which requires the approval of this DA, will lock us into the use of native forest wood for another 10 years, with 5 yearly extensions after that, significantly slowing down the transition to plantation logging. This is a regressive move for the industry.

The proposal may also have economic consequences. The development is at odds with the South Coast's regional identity, and how we wish to promote ourselves. Our economy is

highly dependent on tourism, and even beyond the impact on air quality, noise quality, and large vehicle transport, being home to one of the nation's largest sawmills of native forest is antithetical to our image of "magnificent wilderness" (a phrase used in a local tourism brochure). Often, community support for such ventures is founded on the wish to support local jobs. However, approving the DA will mean a reduction in jobs: 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. We hope you will take these considerations into account when making your decision.

Thank you for your time,

[REDACTED]  
[REDACTED]

**From:**   
**To:** [RecordsMailbox](#)  
**Subject:** Eden woodchip mill  
**Date:** Tuesday, 5 May 2020 10:02:38 AM

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Dear Council,

It is distressing to hear that Allied Natural Wood Exports is seeking approval for a new sawmill, pallet plant and briquette plant.

Our native forests are much depleted as it is, with endangered and vulnerable wildlife losing ever more habitat, due to excessive logging.

It is a disgrace that native forests are logged to be chipped and exported or burnt as briquettes. This is not sustainable.

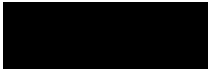
The industry needs to move to plantation timber - it has had decades to do this, but has continued to exploit and degrade native forests at the expense of wildlife and taxpayers.

There will be an overall loss of jobs as the sawlog industry is closed down to feed the chipmill and briquette plant.

Council needs to take account of the impact of climate change on forests and wildlife, and the fact that much of the forests has been impacted by the recent bushfires.

Please, to protect what is valued about our local area, do not allow this expansion to proceed.

Yours sincerely,

  
Bermagui 2546

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Monday, 11 May 2020 3:11:51 PM  
**Attachments:** [Eden Chip Mill.docx](#)

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11 May 2020

General Manager,  
Bega Valley Shire Council,  
Bega NSW 2550

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

I wish to oppose the new mill on the following grounds:

**BVSC has declared a climate emergency. If you allow this development to proceed, it makes a mockery of this declaration.**

Native forests are the most efficient means of carbon storage, to help us address our climate emergency. The recent fires have devastated the forests of the South East region of NSW and north-east Victoria, and released untold amounts of carbon into the atmosphere.

Millions of animals have died. Bega Valley Shire Council has a responsibility to conserve our natural heritage, and give our forests and animals a chance to recover.

The area was already over-logged before the fires. It is scientifically proven that logging makes the forests more vulnerable – see research by Professor David Lindenmayer. Commonsense tells us that plantation forests should be used for woodchips, not native forests.

The development would make this one of the biggest sawmills in Australia, and give it a monopoly over the forests of our region. Our native forests will continue to be turned into woodchips and exported, an uneconomic business, which depends on taxpayer subsidies to function. It brings no benefit to our region, as even the number of employees will be



greatly reduced. It will employ only 20 people.

At the very least, this development application should not be considered until the Royal Commission into the bushfires has reported its findings.

Lets look for a sustainable future together. Please reject this application.

Yours sincerely,



Bermagui

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Cc:** [REDACTED]  
**Subject:** Submission re: Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Tuesday, 12 May 2020 7:06:01 PM

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Dear General Manager

**Submission re: Timber Optimisation Hub, Development Application (10-2020-81-1)**

Please take into account my submission with regard to Development Application (10-2020-81-1) and, as a Eurobodalla property owner, my deep concern that this DA, by creating one of the biggest native forest mills in Australia, will further degrade south coast native forests and hasten extinction of species dependent on these forests. I urge you to let the Bega Valley Council know that this mill should not be rebuilt let alone expanded. The mill is responsible for non-sustainable industrial logging of the little remaining native forests, after the devastating bush fires.

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. In the summer bushfires, more than 80% of South Coast forests were burnt in the summer bushfires, the forests of our region simply cannot support this expansion.

In addition, I am concerned approval of this DA will create monopoly access to timber, as it will allow the Eden chipmill to become the monopoly buyer of every tree logged in the Eden Region, probably extending to Eurobodalla and Shoalhaven. Jobs will be lost in local sawmilling. In 2019 Blue Ridge Hardwoods, with 55 employees lost the Eden sawlog Wood Supply Agreement to the woodchip mill and is now in the process of closing. The mill will employ just 20 people, according to the DA.

You are probably aware that the science tells us that logging increases the risk of bush fires. Council will be endangering the homes and lives of residents along the south coast if industrial scale native forest logging continues.

Logging also contributes vast amounts of carbon dioxide emissions through tree removal and post-logging burns. Approving this application will make a mockery of the Bega Valley Shire's declared climate emergency and Climate Resilience Strategy.

We need to be growing forests to deal with the climate chaos not destroying them and this proposal prevents a transition to plantations for the wood chip industry and perpetuates intensive native forest logging which has already so degraded the forests of the region.

Yours sincerely

[REDACTED]

Congo, NSW

Sent from [Mail](#) for Windows 10

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Do approval expansion fo the pulp mill at Eden  
**Date:** Monday, 18 May 2020 5:56:03 PM

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Dear General Manager and All Councillors,

The fires have created long-suffering forests, so hammered over summer, and are now all the more precious.

I feel strongly about this plan for expansion of the pulp mill at Eden into other low-value timber products.

I don't want to see our beautiful and precious ecologies destroyed before we can get back to climate safety.

I find it insanity for this to even be considered. True ecologists would be against it and if you listen to science then you would not approve this expansion in our already devastated forests. This could only result in more erosion and wildlife displacement in a fragile devastated ecosystem.

Please listen to true scientific advice and stop the expansion of even more devastation on the brutalised ecosystem on the coast. I will be most disgusted if this expansion goes through and my vote will definitely reflect my disapproval.

Sincerely yours,

[REDACTED]

Dalmeny

Submission by [REDACTED]

Allied Natural Wood Exports (ANWE), owner of South East fibre Exports P/L (SEFE), proposes a Timber Optimisation Hub, to process 60,000 cubic metres per annum of regional native forest wood into sawn timber, pallets, and briquettes. ANWE's sawlog supply agreement with the Forestry Corporation of NSW (FCNSW) for 25,000 cubic metres of sawlogs is dependent on having the Development Application (DA) approved by the Bega Valley Shire Council and also on signing a softwood supply contract. Until the end of 2019 the Corporation's sawlog agreement was with Blue Ridge Hardwoods, which will cease operations shortly.

SEFE also has a wood supply agreement (WSA) with FCNSW for supply of 340,000 tonnes of pulplogs per annum.

The DA seeks approval for construction of sheds on the current site of the Eden chipmill for sawlog, pallet and briquette production, providing employment for 20 people, compared with Blue Ridge's former level of 55 employees.

The mill's new operations are intended to be integrated following repairs to the existing mill damaged in the recent bushfires. They are dependent on obtaining supplies from the forests of Bega Shire and Eurobodalla Shire in NSW and East Gippsland in Victoria. The proposed hub thus will have economic, environmental and social impacts far beyond the chipmill site.

I wish to submit opposition to the proposal taking account of the following factors:

- a contentious use of public forests, especially post-bushfires
- the hub's monopoly buyer position
- risk regarding supplies and markets
- fire risk in a hotter, drier climate
- wood based energy

The ANWE proposal affects forests far beyond the scope of Bega Shire Council's responsibilities. As indicated above the logs will be sourced from forests in the Bega Valley Shire, the Eurobodalla Shire and from East Gippsland in Victoria. Impacts from the logging are far-reaching, many are adverse, and should be a major element in the Bega Valley Shire Council's consideration of the DA.

#### *A contentious use of public forests*

These are public forests, they have purposes and values other than the supply of wood - as habitat for unique wildlife and plants, for community health and recreation; they have important roles in climate and rainfall cycles. Other industries, including agriculture, oyster growing, honey production and

tourism, in the Shire and far beyond, and regional water supplies are adversely affected as native forests and their waterways are degraded by logging.

### *A monopoly buyer*

The Wood Supply Agreement for provision of sawlogs to ANWE from the Eden Regional Forest Agreement area makes obtaining DA approval a condition of the WSA's implementation. It provides for variation of the volumes of wood above and below the specified quantities and for wood to be supplied from outside as well as inside the Eden RFA area.

The Chipmill already has a WSA for supply of pulplogs, with similar latitude in regard to volumes and source areas for supply of logs. Together the two WSAs would mean that ANWE will have a monopoly of all logs produced in the Bega Valley Shire, a near monopoly of logs produced in Eurobodalla Shire, plus access to Victorian logs, which gives it an unhealthy level of negotiating power over the NSW Government as to when and where and to what extent and at what royalty rates logging will be conducted in the SE of NSW. Moreover the WSA agreement provides for open-ended five year extensions of an initial ten year supply agreement.

In these circumstances, rather than presenting as a simple permit for a modest addition to existing activity on the site, the DA, if approved, would legitimise a major monopoly business largely controlling management of the entire public SE forests.

Resolution of this larger question really lies outside the Council's remit: particularly with the NSW Government, but also touching on Commonwealth responsibilities. The Council should either reject the application or refer the question for determination to the NSW Government as a designated development.

Even before the bushfires there were reasons to question the industry's future. During the 20 year life of the first round of RFAs the forestry industry (native forestry and plantation forestry) underwent many changes: increasing mechanisation and capital intensity, and hence a declining workforce; a roughly 80% transition to plantation wood preferred by most domestic and global processors, and declining yields in the native forests.

The opportunity to restructure the industry by completing the transition to plantations (as New Zealand had done successfully and profitably) was missed as the disasters from the failed Managed Investment Schemes played out.

The bushfires in January and February of this year have been a wake-up call for the region. Lives and property were lost and many businesses ruined,

with much community trauma, a shocking toll on wildlife, and 80% of available forest burnt. Government shut-down measures in response to the covid-19 emergency have compounded the region's difficulties.

### *Lack of clarity about supplies and markets*

With so much damage to the managed forests and the region's national parks and reserves, FCNSW declared *force majeure* on all the wood supply contracts. So far as we know the declaration is still in force. Nonetheless both the NSW Government and FCNSW are making tentative moves to give an appearance of business as usual. The Environment Protection Agency has approved minimal changes to old regulations for individual compartments in burnt forests, out of context, as if those compartments are the only areas burnt.

Is it realistic to try to continue a native forest based business essentially as if the fires hadn't happened? Surely it is a time to reconsider whether the logging should continue at all. Again this is not a question for a simple determination by Bega Shire council.

What certainty could there be that the WSA volumes could be delivered? Obviously the chipmill has benefited in getting logs from the post-fire clean-up measures, but that won't provide a permanent supply.

The Department of Primary Industries and Energy acknowledged long before the bushfires that virtually all the forests in the Eden RFA area that were available for logging had been converted from mixed age, mixed height forest to dense young regrowth of uniform heights.

In 2014 the Blue Ridge sawmill had complained about Forestry Corporation's management of the forests and its concerns that there would increasingly be inadequate supplies of large sawlogs. (The fact that its machinery could not process small logs was one reason why it did not obtain the new sawlog WSA.)

It is not surprising then that when DPIE recalculated yields for the new wood supply agreements before the bushfires the volumes to be made available were considerably reduced.

Before the bushfires the Andrews government in Victoria announced planned phasing down of native forest logging and an end by 2030. The East Gippsland bushfires make supplies from that region in the interim period both more uncertain and more contentious.

ANWE's woodchip export market is also uncertain because paper makers will not accept chips contaminated by charcoal.

Additionally, if approved, the hub's products will compete in commodity markets already occupied by plantation based products better able to survive downward pressures on costs and prices.

### *Fire risk in a hotter, dryer climate*

There is now strong scientific evidence that in the South East, as in Australia more generally, forests policies and native forest management have made a major contribution to fire risk, that decades of industrialised logging of native forests have made the forests far more fire prone and water hungry, have degraded water supplies and forest soils, have pushed many forest dependent species closer to extinction either regionally or nationally, and have had harmful health and other social consequences. With the prospect of hotter and drier conditions in future, native forest management can only be increasingly contentious.

Climate scientists now express great concern that the planet may be close to planetary tipping points when humans lose the capacity to deal with major planetary upheavals. They have shortened the time frame for needing urgent action to make large reductions in emissions reductions.

Australian government responses and the public debate have concentrated on emissions from fossil fuels, in both domestic and international policies. Given the inadequacy of action to date to control emissions from fossil fuels, many forest and bushfire scientists and conservation groups are now calling for a much greater policy emphasis on the role of forests in the carbon and water cycles, as major carbon sinks and because of their capacity to draw down CO<sub>2</sub> from the atmosphere, and for their importance as rain-makers.

The Council, which supports action on climate change and developing climate resilience, is now being asked to approve a proposal that can only exacerbate the emissions problem, while making the forests less productive, and less able to adapt to hotter and drier climatic conditions.

### *Wood-based energy?*

Before the fires Commonwealth and State energy ministers, agencies and industry leaders were seeking new wood product markets, especially for pulplogs and woodchips, including during a visit to Japan. Industry has pushed for using native forest pulplogs for energy production and heating, including as a substitute for coal. In Europe, the UK and South Korea there has been a very large increase in wood-fired energy production, even as opposition has grown in supplying countries. Vales Point power station in Australia has tested native forest wood biomass with coal in its energy inputs.

However the scientific evidence indicates that wood-fired power is in fact more carbon emissive than coal, and especially so for Australia's very carbon

dense native forest wood. Global and Australian rules that treat native forest biomass as renewable, although trees have been logged far faster than they can be regrown, provide financial incentives, as do carbon accounting rules.

Meanwhile rapidly reducing costs for genuine renewables like solar and wind energy mean that the case for not logging native forests for the energy market is strong on economic as well as biodiversity, environmental and climate grounds.

### *Conclusions*

It is now clear that fundamental change in forest policy is needed, that political assumptions about ecological sustainability and setting a balance between logging and environmental protection has not kept forested regions, people or wildlife safe.

Rural communities that have been shattered by the bushfires have had adverse economic impacts compounded by the covid-19 economic shutdown. Everyone is anxious to see the regional economy recover as quickly as possible. There is a natural temptation to try to rebuild existing industries. But wide-ranging measures will be needed to develop resilience from future bushfires. The forests are in no state for business-as-usual to be the basis of future forest management.

The Council has responsibilities in the Shire towards other industries as well as the native forestry industry. Health authorities have long been concerned about the health impact of the logging and post-logging burns conducted in the State Forests. Agriculture, oyster growing, honey production, tourism and water supply all depend on healthy forests; all will be adversely affected if the ravaged forests are further degraded to extract what is left after the bushfires. Again these are concerns that go far beyond the Shire boundaries.

Dealing with these broader issues are really matters for State and Commonwealth governments. Neither the Bega Shire Council nor the people of the south east should be asked to put their region's futures at risk by approving this development application, especially while so many uncertainties are unresolved. Native forestry is a minor contributor to the Shire's economy and employment opportunities. The Shire needs transition and retraining packages for displaced workers and a focus on restoring the capacity of its native forests to adapt to a changing climate.

### *Recommendation*

Bega Valley Shire Council should reject this application.



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** The Expansion of the Eden Wood Chip Mill  
**Date:** Wednesday, 6 May 2020 11:52:26 AM

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Dear Sir/Madam,

I wish to express my deep sadness that the Council has chosen to expand the Eden Wood Chip Mill at the cost of the environment and all that it contains within.

When is enough enough.

Did the fires not decimate our forests during the Winter and the Summer?

It is not only the forests but the eco system as a whole.

This takes time to rejuvenate itself although it will never ever be the same as it was and we have to nurture it back not go in and destroy what little is left.

Why would you want to create a desolate wasteland when you have a choice?

I feel the Council has no vision for the future of Eden or the valley as a whole.

The beauty of the surrounding forests is what makes our Country unique.

If Councils continue to destroy what little we have left of our native forests and allow developments to go ahead knowing we are the driest continent on earth then you will have to live with your decisions knowingly that you are partly responsible for the Earth being destroyed and every living thing it contains.

Sebastiao Salgado the Brazilian photographer has come out against the continual decimation of the forests in Brazil.

If we are one Earth and all connected as the Corona Virus will tell you it is then it is time all Councils begin to understand that their decisions locally affect everyone globally this is a fundamental fact.

Please think of the broader outcome and not the short term outcome and how Councils manipulate data to make it look as though you have done the research and often say " we have done everything to the book under the Council Guidelines and this proposal is within those guidelines".

We have heard it all before and it is against all scientific proof , we now have to stop destroying our forests for monetary gain otherwise we will have no Earth left for our Children and grandchildren.

It can happen quickly and it is up to you to make that difference.

We cannot keep destroying our forests the bush.

Forests create oxygen they are the lungs of the earth what happens when our lungs don't function?

We die!

Please, please ,please, think carefully about this decision as it will be on your conscience for the rest of your life.

Living in Hope,

[REDACTED]  
Braidwood N.S.W. 2622



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Timber Optimisation Hub D. A.  
**Date:** Wednesday, 13 May 2020 11:40:34 AM

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

This DA constitutes a further step in the entrenchment of industrial scale logging in our region's native forests, thereby impacting adversely on regional biodiversity and the forests' capacity to store carbon.

The "Biodiversity and EPBC Act Protected Matters Report" was written before the 2019/20 bushfires and consequently does not reflect the changed circumstances stemming from the burning of around 75% of the region's production native forests. The environmental impact of these fires could well prove to have been profound. The impacts of logging in this changed environment need to be assessed by those with the expertise to do so. Before this DA is rubber stamped, these matters should be addressed.

[REDACTED]  
Candelo NSW 2550

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

**Submission to Bega Valley Shire Council from [REDACTED], [REDACTED], Bodalla, 2545.**

The proposal covered by this DA encompasses activities and impacts that extend beyond the development site and the structures on it. This proposal would have impacts on the water catchments, forests and roads across the region to the north, south and west. These range of activities, not dealt with in the application, include climate change, regional water catchment impacts particularly water yields and quality for Bega Valley and Eurobodalla forested catchments, an increase in heavy vehicle movements on regional and state roads, biodiversity impacts, and bushfire and air quality changes.

By way of background I feel appropriately qualified to comment on the Timber Optimisation Hub, I have over 30 years' experience measuring and assessing forest and catchment values for agencies such as Forests NSW and NPWS particularly across south east NSW.

### **Catchment Impacts**

The Timber Hub is the wrong industry in the wrong place for South East NSW. The sourcing of the very high volumes of timber required to supply the Hub will adversely affect water catchments, particularly those in the Bega and Eurobodalla Shire areas. Current knowledge has shown that to fulfil the required timber volumes for the plant, highly mechanised industrial scale logging would be carried out. This type of activity has severe consequences for water yield catchments both in terms of quality and quantity. Mature mixed aged native forests maintain stream flows naturally, regulating water quality and quantity available. Following intensive logging events soils are compacted and highly disturbed at the same time. During rainfall events these soils can generate higher levels of pollution and erosion and also remove many nutrients from the forest soils. In the forest regrowth stage, young regrowth forests take up greater amounts of available water consequently drying up soils and stream flows. At a landscape scale these types of activities have a detrimental impact on natural processes for a catchment by adversely affecting water quality and making less water available. This becomes a major issue for town water supplies particularly in Bega and Eurobodalla as was experienced during water restrictions in late 2019 early 2020. A situation likely to worsen in the future if approval for this type of industrial activity is allowed to continue.

### **Bushfire impacts**

This proposal is of huge concern as it does nothing to ameliorate bushfire risk across SE NSW into the future. The reason for this is clear and simple. The scale of logging across the region to feed this plant means that forests across the region will get younger. Younger forests are more flammable.

### **Loss of Biodiversity**

The intensification of logging over the last hundred years has impacted on flora and fauna species biodiversity. This is best shown by drawing your attention to the fact that koalas one hundred years ago were once common place in coastal forests but this iconic species have now been pushed to the brink of extinction in this region. We cannot allow this to continue. This proposals with its

significant reach for forest resource must be stopped. Koalas deserve survival and the opportunity to prosper.

#### Truck movements

This proposal will generate a large amount of heavy log truck movements on the regions' highways putting the community at greater risk. It is concerning that this issue is not addressed in the application.

#### Conclusion

In closing, this development should not be approved for reasons mentioned above and more. It is an industry that is out of step with the contemporary needs of a climate changing world. It is not sustainable and will continue to have adverse impacts from industrial logging across Eurobodalla and Bega Valley shires.

The maintenance of an unsustainable native forest timber industry is out of step with the development of sustainable new nature based tourism and agricultural based industries which both Eurobodalla and Bega Valley are striving to achieve. It is unprecedented that a project that supports the continuation of the native forest woodchip industry is considered viable.

Yours sincerely

A solid black rectangular box used to redact the signature of the sender.

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Eden Wood Chip Mill Redevelopment- Attn: Leanne Barnes  
**Date:** Wednesday, 13 May 2020 9:56:20 AM

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Dear Ms Barnes,

As a resident of SE NSW who has just been through our horror bush fire summer, I am concerned about the increased size of the Eden Wood Chip Mill redevelopment.

My concerns are:

1. We need to support a sustainable timber industry that transitions away from unnecessary timber harvesting (old growth, habitat) and provides sustainable jobs into the future. See the following strategy from Victoria:

<https://www.premier.vic.gov.au/securing-the-future-for-forestry-industry-workers/>

2. More than ever we need to balance environmental health and human health. Continuing to grow unsustainable industries is not forward thinking in any way.

3. Who would have thought that we would reach the time when the koala becomes endangered, let alone numerous other, lesser-known species? This is unconscionable. We must protect native habitat, especially after we lost so much in the recent bush fires.

4. Climate Change must be faced with balanced, thoughtful and forward looking strategies to support ongoing employment and health for the entire region. Increasing the size and scope of the Eden Wood Chip Mill is grossly negligent, bearing in mind all of the above points.

I hope that you will consider the future of our region from a much more holistic and progressive perspective, realizing that human health is entirely dependent on the health of our precious eco-systems.

Kind regards,

[REDACTED]  
Congo NSW 2537  
[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Cc:** [beqa@parliament.nsw.gov.au](mailto:beqa@parliament.nsw.gov.au)  
**Subject:** Submission  
**Date:** Wednesday, 13 May 2020 2:17:37 PM

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

### **Submission to Bega Valley Shire Council**

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. 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 over logged.

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.

Jobs will be lost in local sawmilling. In 2019 Blue Ridge Hardwoods, with 55 employees lost the Eden sawlog Wood Supply Agreement to the woodchip mill and is now in the process of closing. The mill will employ 20, according to the DA.

This DA would allow 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.

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

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.

This proposal stops a transition to plantations for the wood chip 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.

I urge you to please consider the above .

Regards



Malua Bay



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Date:** Monday, 11 May 2020 5:31:12 PM

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Dear Councillors & Staff,

Eden and most of Australia has been devastated by bushfires this summer. It's plain for anyone to see that the last thing our environment and wildlife need right now is increased pressure from logging.

The request by the Eden Chipmill to expand operations at this time, turning our precious native forests into pallets and briquettes is just plain wasteful and must not be supported! They should be forced to grow plantation timber should they wish to expand. But that takes too long, I hear the Eden Chipmill say. Well, our Australian native animals feel the same way. They need homes, they need food and shelter, just like human beings. Why are their needs less important than our own? They've suffered enough this year and we've done enough damage. Every native tree is now more precious than ever.

We won't have much time left on this planet if we keep disrespecting it the way we have. We need to be actively reversing past poor decisions, not making things worse. How about revoking native forest logging altogether?

If you can't see the good sense here, just ask yourself - what will we leave our children?

Yours sincerely,

[REDACTED]

[REDACTED]

Kiama Downs NSW 2539

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Objection to DA - Allied Natural Wood Exports  
**Date:** Wednesday, 13 May 2020 8:34:43 PM

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Dear General Manager,

My name is [REDACTED] and I am writing to you in opposition to the DA lodged by Allied Natural Wood Exports

It is completely unfathomable that just months after the bushfires devastated our region that such DA would be approved that would mean the end of the last of our surviving forests.

As I am sure you would agree this past summer was traumatising to say the least. We are reminded everyday of the effects of the bushfires on the prehistoric forests that were brunt to a crisp. Not to mention the billions of animals that were lost and the ecosystems that will take hundreds of years to recover. We cannot let the last of these precious forests be logged for wood chips...

If this DA is approved it will mean that Allied will have the monopoly of the industry and have rights to every tree that is logged without opposition. I don't support the timber industry at all, but the fact that this development doesn't even create healthy competition raises alarm.

This industry just takes from the environment and their sustainable practices are non existent.

The DA does not clearly specify that the areas logged will only be plantations. There needs to be clearer restrictions on their access and ability to log.

The DA also states that the mill will only employ 20 people! This is insane. At least make them actually have some positive impact to the region by employing locals.

We have an opportunity to be at the forefront of the climate action movement and make real change for our futures. Don't make us go backwards by failing to prepare for the future. What happens when they log all our forests and tourism to the region stops because the area has been savaged by loggers?

The council should be encouraging more future focused business to the area with grants and support to create a thriving economy for us all. You should be doing everything you can to preserve our INCREDIBLE region and create a future that is something to be proud of by protecting our environment and it's inhabitants, both human and animal.

i look forward to hearing your response to this mater.

Best regards,

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#); [lisa11cross@gmail.com](mailto:lisa11cross@gmail.com); [Erin Moon](#)  
**Subject:** Eden Woodchip Mill  
**Date:** Wednesday, 13 May 2020 11:12:12 AM

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To Whom It May Concern

I am writing to voice my objection to the expansions plans for the Eden Chipmill.

Our forests have been decimated by the recent fires, and we need to preserve what we have left.

Eden has had an unreasonably rough start to the year - first the fires and now the COVID19 stopping tourism and cruise ships. The residents of Eden need investment in sustainable industry, not short-sighted return to business as usual that cannot last.

There is no future in logging native forests. It is wrong to allow investment in this area. It will not bring hope to the residents. It will only bring destruction to the natural world and further deepen the sense of despair that many of us are feeling.

Please stop this expansion. As a region we need to find a way to flourish, but investing in destruction is not the way forward.

Many thanks in advance,

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** re: Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Monday, 11 May 2020 7:36:12 AM

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To the Committee in Charge of the Timber Optimisation Hub.

I am one of many concerned citizens who would like to raise my voice with regards to the proposed 'Optimisation' which would impact native bush and forest lands.

Considering all that has so recently taken place in our beloved bushlands and forested areas we urgently request you to consider protecting what is left of them and not incurring further into undeveloped and native bushland and forested areas.

More than ever, these places should be protected and remain intact so that we can preserve our native fauna, flora and the animals that depend upon them.

We owe this much to the future generations and as to the habitats themselves.

Yours Sincerely

[REDACTED]

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[REDACTED]

\*\*\*\*\*

[REDACTED]



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Eden Mill proposal  
**Date:** Tuesday, 12 May 2020 7:52:12 PM

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Dear Councillors,

As a local whose livelihood is in the Bega Valley, I am writing to urge you to reject the proposed plans for a new sawmill, pallet plant and briquette plant.

We need a moratorium on logging in the Bega Valley. We have lost 80% of our forests in the recent devastating fires and the only hope for this region (and the tourist industry on which we thrive) to recover is to prevent logging of both the residual unburnt portion of forest and the burnt forest.

The burned areas have been devastated and can only possibly recover if not logged. Logging is highly destructive for the entire ecosystem, even when it is robust. If logging is allowed to resume you will cause devastation to flora, fauna and waterways. While you're at it you may as well shoot the tourism industry in the head, too.

The Bega Valley Shire Council has accepted the scientific fact of a climate emergency And we have seen appalling evidence of it this summer. These are not just words. The effect of the bushfires on the climate and the local environment was catastrophic and logging - regardless of the current state of the forest areas selected for destruction - will be the nail in the coffin. I am pleading with you, don't let this happen. There are many residents including myself who will be forced to leave.

[REDACTED]  
Dalmeny 2546

Sent from my iPad

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Submission for DA of Timber Optimisation Hub  
**Date:** Wednesday, 13 May 2020 2:57:35 PM  
**Attachments:** [Chip.MILL.docx](#)

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[REDACTED]  
Bermagui, NSW

2546

13/5/2020

Dear Bega Valley Shire Councillors.

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

I am writing say that I fiercely and wholeheartedly object to the above Development Application. I suspect that this proposed development has other underlying motives than just to build new buildings to replace the ones lost in the recent bushfires. I suspect that it is aimed at increasing the capacity of the Allied Natural Wood Exports to mill saw logs.

Which means increased native forest logging.

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.

**It is widely accepted that old growth forest is fire-resistant, and that mature trees provide habitat for countless native species that are now under threat.** Not to mention that native forests are the best means of carbon sequestration, capturing and producing more moisture in rainfall.

All Rural Fire Service leaders, past and present, agree that the recent bushfires were due to the unprecedented dryness of the forest from the long running drought. The long running drought was, in turn, the result of climate change. To increase logging operations would simply exacerbate this cycle.

Since the bushfires in January my husband and myself have been dealing with PTSD and mental health issues ensuing from the trauma. We have been and are directly and personally affected by the fires, by the drought, by Climate Change, by the dry forests, by destructive practices of logging old growth forests.

We need to re-educate and turn the whole ship around now and gear our Forestry practices and jobs towards renewable and harmonious land management practices. Not based on profits.

Human and animal lives are at risk here. Please consider this DA with the intelligence of all your hearts and minds.

We have a golden opportunity to make a real change.

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]





**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** SUBMISSION: Development Application (10-2020-81-1)  
**Date:** Saturday, 9 May 2020 12:26:53 PM

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To whom it may concern,

Thank you for the opportunity to provide a brief submission regarding the proposed development of the Timber Optimisation Hub at the Eden Chipmill site.

Although this development application does not specifically deal with logging practices or locations associated with this development, I would like to submit my concerns regarding the impacts on visual and cultural amenity that further expansion of this site (and consequently logging practices) will likely have upon the surrounding area. In particular, the visual impact assessment notes high visual impact in certain areas containing tourist development in and around Eden. Furthermore, these visual impacts and the presence of an expanding industrial development will serve to undermine branding of the Sapphire Coast as a 'clean and green' place to visit and explore.

Furthermore, I am concerned that the application has not adequately considered the consistency (or lack thereof) of this proposed development with Council's policies in relation to climate change adaptation and resilience, including protection of biodiversity and the promotion of a diverse economic base which supports rather than depletes our Shire's precious natural resources. Given the enormous loss of biodiversity that has already taken place due to ongoing unsustainable logging practices (which are regrettably excised from environmental decision making processes under the EPBC Act), drought and the recent bushfires, I implore Council to conduct individual development-related decision making in accordance with its wider strategic planning framework in relation to both the environment and economic development.

Once again, thank you for considering this submission.

Yours Sincerley

[REDACTED]  
Upper Brogo 2550

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** re: Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Monday, 11 May 2020 1:26:55 PM

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Hello

I am writing to register my opposition, in the strongest possible terms, to the further milling of any kind along the NSW south coast, or anywhere else in NSW.

To follow on from the devastation of the fires over the summer with logging makes no sense. It's time to preserve what we have left, not to continue the destruction already commenced by the fires and years of clear-felling. We must give the wildlife a chance to survive and with further habitat destruction it is unlikely they will be able to do this.

Please. It is time to move on from the logging industry. We have other industries to build, and other ways to access resources. The country has suffered enough. Please stop this.

[REDACTED]

**From:**

**To:**

[RecordsMailbox](#); [Councillors](#)

**Subject:**

Eden woodchip, biofuel, and timber mill proposal file reference DA numbered 10-2020-81-1

**Date:**

Friday, 8 May 2020 5:18:19 PM

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The General Manager & Councillors  
Bega Valley Shire Council  
Box 492, Bega 2550

Dear Sir / Madam

We understand that the Eden woodchip mill was not closed down as a business choice but was damaged in the intense widespread summer fires.

The mill owner, Allied Natural Wood Exports (ANWE) seeks approval from Bega Valley Shire Council not just to replace what was lost but to build a new sawmill, a new pallet plant and a new briquette plant.

This proposal is manifestly worse for the Bega valley and national environment - where the original chip mill was an ecological disaster and wasteful of prime (irreplaceable) native species.

The scale would be devastating not only for the environment, but also for the traditional smaller businesses, in the region of Eden as well as Eurobodalla and Shoalhaven local government areas.

Following the fires, our environment needs cessation of logging to allow recovery of the affected areas and all their native animal species, as well as the plant species.

The science of climate change demands that WE change our practices of raping the planet. If the woodchippers (& millers) want trees, first they must plant them, and wait for them to grow. Forestry must no longer be a operation of robbing the common wealth to make private profit; no longer stripping the environment and never restoring it. That was a concept for the 17th, 18th 19th century robber barons in europe.

The science tells us this this is a climate emergency. EMERGENCY !! Not next century but 30 years ago, and getting worse every year since.

The proposal is bad for local business, and bad for local employment and a disaster for a livable environment.

I totally and strongly oppose the proposal.

Yours faithfully



Callala Bay nsw 2540.

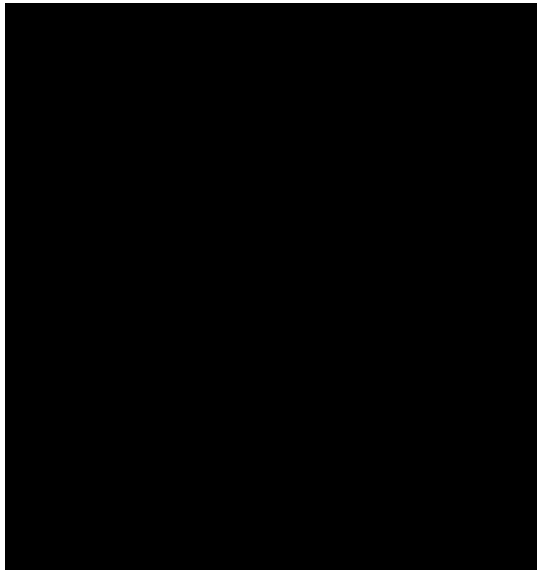
**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Eden Mills  
**Date:** Wednesday, 13 May 2020 8:21:58 AM

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to the Bega Council

As you are about to consider an application to expand the Eden Mills can I ask you to remember the tragedy that our forests and their wildlife have suffered in the past months. We should be reducing our impact on these forests not expanding it AND handing over a virtual monopoly to one company. Thank you

[REDACTED]



**submission to Bega Valley Shire Council on the Development Application by Allied Natural Wood Exports (ANWE) and Pentarch Forestry Pty Ltd for the Eden Chip Mill Timber Optimisation Hub (2020.81)**

I am writing on behalf of the South Coast Health and Sustainability Alliance (SHASA). SHASA is a Eurobodalla based community, not profit organisation committed to undertaking practical projects to achieve a low carbon Eurobodalla. We have been running solar bulk buys for 3 years, an electric bike hire service and installing solar on a number of community facilities in the Eurobodalla. I

We are writing in relation to the development application from ANWE and Pentarch Forestry seeking consent to construct a log sorter, sawmill, pallet mill and briquette plant at the site of the Eden chip mill which was damaged in the extensive bushfires of 2019/20. We strongly object to this development on the grounds that it is inconsistent with the objects of the NSW Environment, Planning and Assessment (EP&A) Act, in particular:

- (a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,*
- (b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,*
- (e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats.*

We also believe that it does not meet the heads of consideration under Section 4.15 of the EP&A Act, which outlines matters that a consent authority must take into consideration when determining a development application, because:

- 1. it is inconsistent with the objectives of the Bega Valley Local Environment Plan 2012 (LEP) in relation to the IN1 General Industrial zone which aims to encourage employment opportunities and to minimise any adverse effect of industry on other land use and the heritage conservation clause which aims to conserve the environmental heritage of Bega Valley; and*

2. *it is not in the public interest.*

After many years of logging based on inappropriate harvest cycles, the forests of Eden, the South Coast and East Gippsland no longer support large mature trees that can produce saw logs of the size that they historically did and the timber industry now has to rely on regrowth. The new processing technology that Eden Chip Mill Timber Optimisation Hub development application claims is aimed at maximising the value of the timber resources has in fact been necessitated due to unsustainable forest management practices which have reduced the quality and size of the timber available for harvesting. It reflects poor management, development and conservation of the State's forest resources.

Last summer 80% of what remains of these forests was decimated by catastrophic bushfires. Instead of pausing to assess the damage and review the state of the resource in order to better manage and conserve what is left, the proponents of this development application plan to push on regardless maintaining the volume of logs coming into the Eden mill and extracting as much as they can from this dwindling supply before it is exhausted. In our view this is not the proper management, development and conservation of the State's natural resources nor is it in the public interest. It certainly will not contribute to the conservation of the environmental heritage of the Bega Valley nor will it protect the environment.

The majority of products from the Timber Optimisation Hub will be low quality and low value comprising largely wood chips for pulp (70,000t), pallets (15,000 – 18,000t), and briquettes (4,000 – 8,000t). In addition, the briquettes are destined to be burnt and the briquette plant itself will be partially powered by the burning of biomass. This will generate emissions of CO<sub>2</sub> and other greenhouse gases, which are in addition to the carbon losses that will occur during timber harvesting, and cannot be considered to be ecologically sustainable development as defined under the legislation, nor is it in the public interest.

The Statement of Environmental Effects for the Eden Chip Mill Timber Optimisation Hub claims that the proposal will have positive local economic and community benefits including the creation of 20 FTE jobs. Eden, like many parts of regional NSW, has high unemployment and is a socially disadvantaged area so job-generating industries are important and this is reflected in the objectives for the Bega Valley LEP. However, Blue Ridge Hardwoods who previously held the Wood Supply Agreement with the NSW Forestry Corporation for the Eden and South Coast forests employed 55 FTEs. ANWE's proposal therefore equates to a loss of 35 jobs in the Eden area which in anyone's terms is not encouraging employment opportunities as per the objectives of the IN1 General Industrial zone.

If this development application is approved, it will lock in the Wood Supply Agreement between NSW Forestry Corporation and ANWE giving them the sole contract to log the SE forests for ten years with the option for further five yearly extensions. This will perpetuate intensive native forest logging in our region and prevent the transition to plantation forests. We do not consider this to be ecologically sustainable, nor will it protect the environment or conserve the environmental heritage of the Bega Valley. It is definitely not in the public interest.

The proposed development is not just about additions/alterations to the Eden Chip Mill site. It is about the unsustainable exploitation of the Eden, South Coast and East Gippsland forests at a time when they are in their most fragile state recovering from the extensive and intense bushfires of 2019 - 20. With so much of the forest in eastern Victoria and southern NSW burnt during these fires, there is little viable habitat left for forest-dwelling species and any unburnt areas represent an important refuge for these animals. However, in order for the Eden Chip Mill Timber Optimisation Hub to operate and meet its quotas, unburnt areas in these forests will be logged and this will push the threatened forest-dwelling species that rely on these refugia closer to extinction. In our view, approval of this development application will result in a failure to protect the environment and significantly impact on the threatened species that rely on these forests both in the Bega Valley and beyond.

The Statement of Environmental Effects for the Eden Chip Mill Timber Optimisation Hub takes a very constrained view of the impacts of the proposed development, limiting them to the local area in order to avoid addressing the bigger issues of unsustainable logging in the Eden, South Coast and East Gippsland forests and the impacts on biodiversity. However, it is not possible to assess this development application without considering its broader and cumulative environmental impacts in the region. To do so ignores the objects and intent of the NSW planning legislation and in particular the Principles of Ecologically Sustainable Development, as defined under the EP&A Act and the NSW Protection of the Environment Administration Act.

The continuation of these logging practices will also increase Australia's carbon emissions and contribute to Climate Change. This is in no one's interest as the drought intensifies in SE Australia and the probability of catastrophic bushfires, like those we experienced last summer, becomes more frequent. Bega Valley Shire Council declared a Climate Emergency in August last year and is clearly taking Climate Change seriously. In light of this commitment and the issues I have raised above, I urge you to refuse consent for this development proposal.

Yours sincerely



South Coast Health and Sustainability Alliance

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Timber Optimism Hub Development Application 10-2020-81-1  
**Date:** Friday, 15 May 2020 12:46:36 AM

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Submission: OBJECTION

Please accept the following as my submission Objection to Timber Optimisation Hub, Development Application ([10-2020-81-1](#))

1. While the Development Application appears to be for 3 colorbond sheds it will be a gateway approval for catastrophic logging of this unique area

Logging old growth forests for the woodchipping industry is economically and scientifically unjustifiable. In approving the DA Council will be allowing the industry to clear the forests of the South Coast and East Gippsland.

The development will make this one of the biggest native forest sawmills in Australia, processing 60,000 m<sup>3</sup>p/a. Ninety six percent of hardwood sawmills in Australia are less than 45000 m<sup>3</sup>pa 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 facility

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



Centennial Park 2021

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Community submission - Allied Natural Wood Exports application  
**Date:** Sunday, 10 May 2020 1:46:55 PM

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To the Bega Valley Shire Council,

This submission is in relation to the approval for Allied Natural Wood Exports to build a new sawmill, pallet plant and briquette plant. We sincerely ask, for the good of the community and its human and nonhuman inhabitants, that you do not approve this application.

There are many reasons for this request. The proposed developments would perpetuate logging of native forest. This is an issue of existential import not only to the local wildlife but to the local inhabitants: as discussed in a recent article published in *Nature Ecology & Evolution*, 2020, logging increases the landscape's susceptibility to bushfires. Logging causes a rise in fuel loads, increases potential drying of wet forests and causes a decrease in forest height. This leaves 450 tonnes of combustible fuel per hectare close to the ground. In seasonally dry landscapes, as we've already seen earlier this year, this is a disaster waiting to happen.

As a result of these 2020 bushfires, our South Coast forests cannot support added pressure. Over 80% of South Coast forest were lost in the summer, and the remaining forest is habitat for some of the nation's most imperilled species. Now more than ever this needs to be seen as part of the equation, considering the recent bushfires killed over a billion animals nationally.

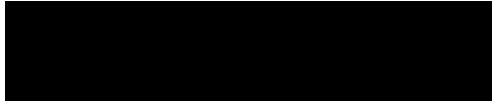
At a broader level, approving this proposal would fly in the face of the Bega Valley Shire's Climate Resilience Strategy. At this stage, it simply shouldn't need explaining that logging contributes to climate change. Deforestation releases stored carbon into the atmosphere as carbon dioxide – both logging, and the bushfires that it helps to create, will increase the amount of free carbon in the atmosphere. Declaring a climate emergency will be mere lip service if the Council approves this application, creating one of the biggest native forest mills in Australia.

Logging also directly impacts soil and hydrological cycles, as the reduction in tree cover leads to increases in water runoff and soil erosion. The degradation of water systems is something which affects us all. Despite the environmental guidelines set in place, there are regular breaches: for example, the Forestry Corporation of NSW recently received a warning for breaching a number of environmental regulations in its operations at Tantawangalo, including failing to implement appropriate stream side buffers. The policing of such breaches are inadequate: formal warnings and fines don't regenerate banks.

This will have ramifications for the industry for many years to come. The approval will oversee the creation of a monopoly buyer for every log produced in the Eden region. Furthermore, the Wood Supply Agreement, which requires the approval of this DA, will lock us into the use of native forest wood for another 10 years, with 5 yearly extensions after that, significantly slowing down the transition to plantation logging. This is a regressive move for the industry.

The proposal may also have economic consequences. The development is at odds with the South Coast's regional identity, and how we wish to promote ourselves. Our economy is

highly dependent on tourism, and even beyond the impact on air quality, noise quality, and large vehicle transport, being home to one of the nation's largest sawmills of native forest is antithetical to our image of "magnificent wilderness" (a phrase used in a local tourism brochure). Often, community support for such ventures is founded on the wish to support local jobs. However, approving the DA will mean a reduction in jobs: 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. We hope you will take these considerations into account when making your decision. Thank you for your time,



## SUBMISSION AGAINST EXTENSION OF WOOD CHIP MILL

[REDACTED]  
Bermagui NSW  
2546

Email:  
[REDACTED]

Phone:  
[REDACTED]

Date: 11<sup>th</sup> May 2020

I have recently heard about this submission. I cannot believe that after fires which according to Forestry NSW has destroyed 80% of State Forests, not to mention National Parks, this extension is being requested. Surely after all we have lost in the way of forests and with Covid 19 we should and could be looking at industry which is sustainable and clean. The knowledge is there. The wood chip mill is a depleting industry with little to offer the community.

We have been setting up water and feed stations for the small population of unique wildlife left after the fires. They need what little forests that are left to gain strength and replenish. The forests have gone through drought, fires and now the suggestion of extensive logging. WHAT IS THE SENSE IN THAT? I am sure after the devastation the few workers at the mill and the truck drivers would like the opportunity of a brighter and cleaner future.

There is so much scientific evidence that logging contributes to fires. I do not have the technological knowledge to know how to include this information in this submission. Trees are essential to our existence.

I am truly concerned about the future for the children of future generations. This has been voiced again and again and often falls on deaf ears. Anyone with children and grandchildren I would think, would want a sustainable, beautifying, conserving future for the young. There is more than ample information on how to do this can be and is being accomplished.

I strongly am against the continuation and extension of the wood chip mill.

Regards,  
[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** No Mill please - [REDACTED] Submission to DA  
**Date:** Wednesday, 13 May 2020 7:43:57 AM

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To the Bega Council,

I am close to tears with the thought of a wood chip mill development in the South Coast.

We are one of the few places in NSW that has the opportunity to keep our incredible wildlife and beautiful bushland.

Everyday I see trucks pass by Bodalla with huge amounts of freshly cut trees - it's not right we are doing this and so short sighted for future generations.

Tourist flock from Canberra, Sydney and Melbourne and many rural areas like Wagga Wagga and Orange - they come because OUR forested area is their green backyard.

This is our competitive advantage and we will have jobs, jobs, jobs from this.

Please do not approve this woodchip. Let's focus on tourism and wildlife as this is where the money is.

Thank you

[REDACTED]

Sent from my iPhone

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

**Submission from South East Region Conservation Alliance (SERCA) Inc, ██████████ Bega NSW 2550**

The South East Region Conservation Alliance (SERCA) Inc, is the principal umbrella organisation for environment groups on the NSW South Coast. It was formed in September 2005 and incorporated on 2nd June 2008 (INC9889501). Its membership includes 14 individual groups in the Bega Valley and Eurobodalla Shires.

The area corresponds closely to the area in which the impacts of this development, if approved, will be most strongly felt.

This application has been lodged at a time of the Covid-19 emergency, when the attention of the community has been diverted by issues related to the emergency. Native forest logging and woodchipping is a highly divisive issue for decades within the Bega Valley and neighbouring shires and for that reason alone this DA warrants the greatest possible public scrutiny. It should not be approved at a time when the community is preoccupied by the health emergency.

### **1. Scope of the Development Application**

The proponents have applied a very narrow and unrealistic focus in identifying and assessing impacts of the development. Its consequences will extend far beyond the boundaries of Lot 16 DP 1066187. Indeed they will extend as far north as Shoalhaven, west to the Snowy Monaro shires and south to the State of Victoria.

These impacts are immense and overwhelmingly negative. The consequences for soil erosion, native forests, wildlife, and CO2 emissions should all have been assessed and considered, but were not.

For some matters such as air quality, noise impacts, water resources and quality (to a limited extent) and motor vehicle traffic impacts beyond the chipmill site were assessed, albeit, inadequately over a wider area. But no effort has been made to assess impacts on forests, wildlife, water resources within the supply zone.

### **2. ANWE will be the monopoly buyer for every log produced in the Eden Region if this DA is approved**

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

[https://www.forestrycorporation.com.au/\\_data/assets/pdf\\_file/0006/1214637/allied-natural-wood-exports-pty-ltd-hardwood-forests-sawlogs.PDF](https://www.forestrycorporation.com.au/_data/assets/pdf_file/0006/1214637/allied-natural-wood-exports-pty-ltd-hardwood-forests-sawlogs.PDF)

### **3. Uncertainty about cost**

There is conflicting information about the cost of the project. In a BVSC video<sup>1</sup> interview, promoting the project on 22 April 2020, the project was described as having a value of \$45 million. However, in

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

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

**Submission from South East Region Conservation Alliance (SERCA) [REDACTED], Bega NSW 2550**

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

Malcolm McComb (ANWE owner/manager) on ABC SE Regional News 7.30am 11 May 2020 gave the cost as \$17 million.

So, we have had 3 different costs: \$45M from Ian Campbell in BVSC video, \$14.5m in the DA itself and \$17M from Malcolm McComb.

The promotional video leaves the impression that BVSC resources may have been misused to boost the development, which could indicate a conflict of interest, or that the applicant has understated the cost in order to minimise fees. These matters need clarification.

The briquette plant has been awarded \$3 million from NSW taxpayers. This was announced by Minister for Regional NSW John Barilaro in December 2019.<sup>2</sup>

### **4. Entrenches intensive native forest logging and stops a transition to plantations for the woodchipping industry**

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

The project seeking approval would provide the means for the woodchipping industry to tighten its grip on the forests of the entire South Coast and East Gippsland. The development will make this one of the biggest native forest sawmills in Australia, processing 60,000 m<sup>3</sup>/a. Ninety six percent of hardwood sawmills in Australia<sup>3</sup> are less than 45000 m<sup>3</sup> a year throughput.

This would be in addition to approximately 600,000 tonnes of woodchips typically exported each year.

Low value new products such as briquettes and pallets do not add value to the region's forests any more than woodchipping does.

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<sup>2</sup> <https://www.dpi.nsw.gov.au/about-us/media-centre/releases/2019/successful-forest-innovation-project-unveiled>

<sup>3</sup> [ABARES 2019](#)

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

Submission from South East Region Conservation Alliance (SERCA) Inc, [REDACTED] Bega NSW 2550



Discarded pallets at the Eden Recycling/Waste Depot

### 5. Water quality and quantity impacts have been ignored

Intensive logging required to supply this mill has been responsible for serious reduction in water quality and availability for important local industries such as oyster growing and agriculture.

Coastal estuaries and lakes can be harmed by logging upstream and oyster growers have been active over many years in attempts to stop or limit logging in catchments such as Wonboyn.

### 6. Soil erosion

Top soils are often lost when logging occurs in catchments, damaging the agricultural productivity of farming land and the regrowth forest. <sup>4</sup> According to the World Wildlife Fund: "Without trees to anchor fertile soil, erosion can occur and sweep soil into rivers, choking and polluting our waterways. Estimates suggest that one-third of the world's arable land has been lost through soil erosion and degradation since 1960."

### 7. Ignores bushfire impacts

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

In the summer bushfires, 80 percent of the forest available for logging was burnt. An estimated one billion animals were killed. The forests of the region were already overlogged and there are serious doubts about whether the forests can supply enough resource to make the industry viable. Establishing this facility will increase pressure on the forests at a time when they need time to recover.

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<sup>4</sup> <https://www.wwf.org.au/what-we-do/species/tree-clearing#gs.5o6h0n>



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

**Submission from South East Region Conservation Alliance (SERCA) Inc, [REDACTED] Bega NSW 2550**

Further, there is growing scientific evidence<sup>5</sup> that intensive industrial logging of native forests increases fire risk and makes fires harder to control. The Border Fire, which in January 2020 travelled from the Victorian border to Eden in a single day is a good example of this. It burnt through some of the most intensively logged forest in Australia having been subjected to decades of logging for the woodchipping industry.

### **8. Climate issues have been ignored**

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

### **9. Approving the DA will slash direct job numbers in sawmilling from 55 to 20**

In 2019 Blue Ridge Hardwoods, with 55 employees lost the Eden sawlog Wood Supply Agreement to ANWE and is now in the process of closing. The new ANWE facility will employ 20, according to the DA. This project will thus be the direct cause of Eden sawmilling jobs falling by more than 60 percent.

### **10. Previous matters before Council**

The Statement of Environmental Effects 2.2 lists previous Development Approvals granted by Bega Valley Shire Council under NSW Planning Legislation.

This list overlooks reference to the 2 metre tall, high voltage electrified fence that was built in 2002 to keep protesters out. The fence was retrospectively legitimised after complaints.

### **11. Conclusion**

There are many compelling reasons to reject the DA. Bega Valley Shire Council will be acting in the longer term interests of residents, ratepayers, their economy and environment if it rejects it. This submission provides a brief summary of key issues only and we are happy to elaborate on all or any other them if Councillors wish.

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<sup>5</sup> <https://www.theguardian.com/environment/2020/may/06/compelling-evidence-logging-native-forests-has-worsened-australian-bushfires-scientists-warn>

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Submission - Development Application (10-2020-81-1)  
**Date:** Wednesday, 13 May 2020 2:28:17 PM

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To Whom It May Concern

In the document titled *Statement Of Environmental Effects Eden Chip Mill - Timber Optimisation Hub March 2020*, it says, on page 1 that, 'it is noted that this assessment was prepared prior to the bush fires that affected the site in late 2019 and early 2020'.

It is further noted that 'Additional commentary has been added to address the changes to the site since this event. Specifically, in the visual impact assessment chapter (refer to Section 3.1.2) and biodiversity chapter'.

However, what is missing is the big picture. It is not enough to amend a clause or two. The forest environment now is very different from the way it was when this report was written.

We need to consider the vast and massive destruction of the forests instead of rushing into further harvesting. The world has changed. This is not the last century. It is 2020. We cannot go on pretending climate change does not affect us. There is no consideration of climate change in this statement of environmental effects. None at all. Just an assumption that forests are resources to be used for export.

As someone who lives locally, I can tell you we have been through an apocalyptic summer. Our climate is getting hotter and drier. We are going to have more fires. Instead of the emphasis being on how to prevent this, there is a plan to harvest unburned forest. To hell with wildlife needing habitat. To hell with humanity needing a safe environment

We need to be doing everything we can to avoid further cataclysmic fires, not burying our heads in the sand and pretending it is business as usual. Our new "normal" looks very frightening indeed. We need to do what we can to mitigate the effects of climate change and adapt. Forestry Corporation does not pay rates in this shire but needs to step up. Forests need to be managed better and fire trails well maintained.

We need to look at pivoting to carbon credits.

According to Forestry Corporation's website, 'In 2005, Forestry Corporation became the first forest organisation worldwide to trade forest-based carbon credits within a registered trading scheme.'

We need to build on that. There are both jobs and money in carbon credits.

When so much of our forests has been incinerated we need to look after what is left. At the very least we need to wait until the findings of the bush fire enquiries before destroying more forest.

The reason to refuse the DA is the unacceptable impact on what is left of our environment.

Think about the world we are creating and the world you want.

We have had wake up calls loud enough to wake the dead.

[REDACTED]

*The monster fire that ate Mallacoota on New Year's Eve and spat out charred toothpicks is galloping towards us.*

Just a few days into 2020, the mayor of Bega Valley Shire makes a heart-quaking announcement. My town of Eden will not be defended.

*How can a town of 3100 people not be defended?*

The answer is that Australian firefighters are stretched to the limit. Our fire season is now months longer than it used to be. It now overlaps with North America's fires. There are not enough resources. A decision has been made. The towns of Bega and Merimbula will be defended from fire. Eden will not.

*It is incomprehensible. Eden has a new \$40 million wharf built to take colossal cruise ships. Literally thousands of people could be evacuated from the Eden wharf. But I do not have time to think it through. The second message from the mayor is terror-striking.*

'Your safest chance of survival is to leave Eden now.'

I have been preparing for bushfires since August. Drought has left the surrounding forests matchstick dry. Climate change is now creating Frankenstein fires. The rural fire service has told us to prepare, to have an evacuation plan and be ready to go. A leather overnight bag, that I bought in Bali in better days, is filled with documents and keepsakes and my passport and the dogs' vaccination certificates. In the car already are a bag of kibble for the dogs and a change of clothing for me. To this I add an air mattress and bedding, just in case I have to sleep in the car then I panic off, forgetting to soak towels and place them under the doors.

Club Sapphire is the evacuation centre in Merimbula. The club is its usual surreal clubby self. Men wearing smart casual pants and women wearing make-up, socialising and playing poker machines. I find a desk with an evacuation sign and try to register but am told the club won't take dogs and am directed to go to Bega.

*Bega is another 30 km away. It lies inland and could easily be cut off from the coast. It is also under threat from two hell fires that are moving closer both to each other and to Bega. I am scared to go there but too scared not to. I am terror-shaken and trembling.*

It is a slow drive on smoke-filled roads and it is getting dark when I arrive at the Bega evacuation centre. The first thing I notice is that it is right next door to the gas distribution centre.

*If there's an ember attack on those giant gas cylinders, the explosion will kill everyone.*

The evac centre is nothing but the old showground rebranded. It faces a nearby mountain that is caught in a conflagration but the smoke is so thick it blacks out the flames. I can barely breathe in the miasmatic smoke.

I am glad I had the foresight weeks ago to send away for a P2 face mask that has a filter. I clutch it like a lifeline. The dogs stay in the car while I register with the Red Cross in the vestibule of an old hall. The floor of the hall is awash with mattresses and bedding for the blank-eyed elderly people and families with dazed young children drifting around.

I am told there is no room for me and I should try to find a camping spot on the oval. I am also told to take a blanket so I rummage amongst a pile and select a woollen one.

Then I drive around the crammed oval looking for a spot for my car, careful not to hit any of the ghostly-looking people emerging through the gloom as I peer through the windscreen.

The showground is now a refugee centre and through the gates I can see a stream of more people coming. The lucky ones here have caravans. Most people have tents.

*Who the hell decided an evacuation centre in a bushfire should be outside?*

On my second drive around the showground, I find somewhere to park. I am next to a woman who has no other shelter apart from a swag she has been lent. We both cough in the turbid smoke that scorches our throat and lungs. She tells me food is available in the pavilion next to the hall.

Here I find volunteers cleaning up after the evening meal. One of them kindly makes me a salad sandwich. I don't want to talk to anyone. Too much fear has inflamed my senses. I cannot cope with anything more. But a feral couple tell me they fled their home in the village of Verona as their house burst into flames. They evacuated to the town of Cobargo and saw fire destroying the main street. Next they evacuated to Bermagui. and then when fire threatened Bermagui, they headed to Bega.

*I feel like telling them to fuck off. They are obviously bad luck. Then I wonder if this is a Lord of the Flies response.*

'It's the government doing it,' the man said shaking his matted head. The woman agreed. 'It's a government plot to get all the hippies out of the hills.'

*I don't need their conspiracy theories. I have my own fear-fed, fiendish thoughts. This is a fight for survival. This is the end of days.*

We are told that if all else burns, the Bega showground will be defended. I speak to a police officer who tells me bluntly that I made the right decision to come here. They are expecting hundreds of people in Eden to be dead by morning.

*I am wretched with grief and incandescent with anger that we have known for a long time that we were sitting ducks and nothing was done to avert this. The state and federal governments both abandoned us.*

Then it begins to rain. It splashes down on my hair, my face and my shoulders. It is not until I go to the toilet and see my speckled self in the mirror that I realise it is ash and soot. I hear hell-roaring thunder too. The nearest fire is so super-hot, it is creating its own weather. Thunder means lightning, which means brutal ignition and more country converted into crematoria for wildlife.

*I check my phone. Many people are refusing to leave Eden. Neighbours and friends are staying to defend their homes. I am terrified for them.*

The Beast is seething, ready to surge. A behemoth against an undefended populace.

*My phone again. People are jammed in at the wharf area in Eden, in their cars, figuring if the worst happens they can at least jump into the sea. Some people are sheltering with their young children on one of the tugboats.*

The Beast is the devil incarnate. Sleep happens on other planets. Not this one. I try to stay calm and rational, cowering in my car, incessantly checking my phone. Through the sunroof just above my head, I watch the sky as it changes from volcanic orange to incandescent red.

*Phone again. My neighbours tell me police have knocked on their door to tell them to get out. But it feels too dangerous to leave Eden. The roads are full of smoke, visibility limited to a few metres. They head to the wharf.*

I need to go to the toilet. There are 2000 people sheltering at Bega Showground. *Sheltering is a euphemism.* The hall can fit only a fraction of that number. The rest of us are outdoors desperate for shelter from the smoke. The women's toilet at the hall is up some stairs. I don't know how the elderly and disabled manage. Near my car is an ancient toilet block. I stumble towards it. Through the murk I see people are walking their horses around the showground ring. I hear children crying. Everyone is coughing. A group of people are praying. This is the apocalypse.

*I check my phone. The police have been to Eden with a bus to try remove people to evacuation centres in other towns. Many refuse to go.*

For me that first evacuated night in Bega is the most terrifying. In the morning I weep with relief when I learn that the Beast reached the edge of Eden - then the wind swung around and sent its fearsome flames elsewhere. Everyone I know in my community is still alive. No houses burned down.

But it is not over. I stay at the Bega Showground in my car for four nights.

*I cry a lot. I cry constantly but I don't know if I am weeping tears of fear for my life and grief for the loss of the environment, or if it is just my eyes watering from so much smoke. I also worry about the smoke I am breathing. What is in it? Trees, lost houses, crisped birds, charred kangaroos, chemicals from sheds, asbestos...*

The experience changes me. What is valuable to me shrinks to a small list. My two dogs; the car that is our current home (and future too, if my house burns down); my keys; my P2 smoke mask; and my glasses.

Then I lose my glasses, leaving them in the shower stall, and when I go back they are gone. Without them I can't see to use my phone. I can't text. I can't access current information about the fires.

*Fuck. I can't cope with this if I can't see.*

I tie the dogs to the car door and turn the car upside down and find, falling apart with relief, an old spare pair of glasses.

The darkness does not lift. It seems perpetual. It lasts for 40 hours and intense disorientation sets in when daytime does not include daylight. Will we ever experience normal again? I develop a ritual to get me through.

*Pat right pocket of pants, checking phone is still there. Pat left pocket of pants checking keys are still there. Fucked if I lose either. Utterly fucked. There are rumours, rumours, rumours everywhere. Conspiracy theories and religious proclamations about judgment day. Pat, pat, pat. Phone, keys, glasses. Pat fucketty pat.*

*What would it be like to die here?* I think everyone is wondering if this is the end. Armageddon. Two mega fires are bearing down on Bega and further south the Beast continues to threaten Eden. There is nowhere safe to go. We are told the Bega showground is the safest place to be and will be defended if it comes under ember attack but I look around and I can't see any buckets of water to put out embers.

*My only shelter is a car out in the open with a full tank of petrol. Fuck, fuck, fuck.*

Eventually we are told we can return home. The danger is not over but it is no longer so cataclysmically life-threatening. My house is still standing but there has been a snowstorm inside and there's residue on floors and counter tops and in corners. It is not white but streaky grey with black smuts. It is ash that has home-invaded, sneaking in under doors and through ill fitting windows.

The Beast seems immortal. It refuses to die. Helicopters fly over the flames with thimbles of water. It is too dangerous for fire fighters to enter the forest due to falling trees. We are told they need to wait until the fire reaches a cleared area - a farm, or a town, or a village before the fire fighters can attack it.

I used to think that fires were sudden rapid events with names like Ash Wednesday or Black Saturday but our Beast has stamina. It gets status, something called a campaign fire. We are told that if we are lucky it will burn for weeks. If we are unlucky it will burn for months.

People in Eden are stupid with fear. I pay the newsagent for a newspaper and she stares at the money in her hand unable to count it.

'Do you want a bag?' asks the young girl in the crapdashery where I buy some crap.

'No thanks,' I say.

'Do you want a bag?' she replies.

We are all exhausted from being hypervigilant. Cognitive function is closed down. We are in fight or flight mode for months.

My car stays kitted out ready for evacuation. Twice more I evacuate but not to the hell hole of the Bega Showground. One time I pay to stay at a holiday apartment in an empty complex in Merimbula. The next time I go to a friend's place, also in Merimbula. To thank her I take her out to dinner and we sit on the deck of a restaurant until the rain of falling blackened leaves and ash forces us indoors.

And still the Beast is unsated. It prowls scarily in secrecy, invisible behind its smoke screen. No one sleeps as the Beast makes its ravenous raids, day and night. There is no clocking off when you might need to flee flames. Forty homes are lost on one infernal night in Kiah, just south of Eden. Many people I know are now homeless. Some are underinsured or not insured.

The army arrives to help and a navy ship arrives in Twofold Bay ready to take refugees. American firefighters arrive as their fire season ends and Australians from other towns turn up as fires up and down the coast are brought under control. Members of the community wear face masks and shuffle through the streets in fear and grief. The stories are terrible. Homes lost. Wildlife screaming as it burns. Forests incinerated.

When the cloche of smoke lifts after weeks, we see that the national park that borders the bay is blackened with plumes of smoke rising from the carnage. It is a war zone. And still the Beast keeps marauding. We are told to stay indoors, to avoid the smoke but the air has been smoky since late last year and we want to go out.

At last the Beast is brought under control but we are warned it is not over, there are hot spots and the wind could whip the fire up again. We are dead-tired. Then one day, finally, the mayor announces that the fire is out. The Beast is dead. That is in mid-March, the same time that another beast, invisible but just as deadly, sneaks into our lives. We are still in fire shock when we descend into another of Dante's circles of hell. Covid 19 begins.

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [RecordsMailbox](#); [REDACTED]  
**Subject:** Re: Objection DA 10-2020-81-1 Eden Timber Mill Expansion  
**Date:** Wednesday, 13 May 2020 1:23:50 PM  
**Attachments:** [ObjectDA05.20Eden.docx](#)

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Dear Leanne and Councillors

Please find attached my objection to the expansion of the Eden wood chip mill site and other projects.

I have not mentioned that I have been a member of the National Trust for 20 years and am Secretary of the Bermagui branch so am thus very interested in the built environment as well as the natural environment and its protection.

Thank you for the opportunity to object.

with regards [REDACTED]

On Tue, 12 May 2020 at 14:31, [REDACTED] wrote:

Leanne,

Please find attached my personal objection to the Eden Timber Mill expansion DA 10-2020-81-1.

Regards,

[REDACTED]

Bermagui

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[REDACTED]  
[REDACTED] Bermagui, 2546  
NSW, Australia  
[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Date:** Tuesday, 12 May 2020 11:31:19 PM

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To Leanne Barnes,  
General Manager  
Bega Valley Shire Council

Dear Leanne,

I am a long term resident of the Bega Valley, I have been born and raised here, and I will spend my whole life here. I am 22, and I care about our environment which supports life.

I am writing to you to register my opposition to the 'Timber Optimisation Hub' development proposal in Eden. I believe it is time for the Government to declare force majeure on all south coast Wood Supply Agreements due to the devastating impact of recent fires on our environment, where more than 80% of our forests were burnt.

At this time the forests and animals desperately need time to recover. The priority right now should be to make sure that any surviving animals have access to food and water and that habitat is allowed to regrow.

International studies have found that commercial logging increases the severity and frequency of bushfires by making them drier. Furthermore, logging following fires has a seriously detrimental effect on regeneration of already stressed populations of plants and animals.

It is now time for our leaders to plan and fund a transition from native forest logging into sustainable industries to employ those working in the industry. The Bega Valley Shire Council must not allow the 'Timber Optimisation Hub' development to proceed.

Yours sincerely,

[REDACTED]



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Redevelopment of the Eden Woodchip Mill post bushfires  
**Date:** Tuesday, 12 May 2020 8:48:06 PM

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Good evening,

I would like to strenuously object to the proposal by Allied Natural Wood Exports to develop a pallet mill, wood chip mill and briquette plant on the existing site of the Eden Woodchip Mill.

I have been travelling to this area of Ben Boyd National Park for 40 years and I have watched the gradual erosion of the State Forests around Ben Boyd National Park with dismay. I have read the report by the Australia institute which establishes that harvesting timber from native forest is not an economically viable operation. I also understand that this renewed Mill will employ just 20 people! It is unfathomable to me why we are destroying what is left of our State Forests after the fires, in order to employ such a small number of people in a project that will never be economically successful.

As a nation, we need to make a transition to the use of plantation timber for paper and wood. The approval of this proposal will lock in the use of native forest timber for at least a decade.

I strongly urge the Bega Valley Council NOT to approve the development application for the expansion and rebuilding of the Mill.

Yours sincerely,

[REDACTED]

[REDACTED]

Meringo 2537  
NSW  
Australia

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Cc:** [REDACTED]  
**Subject:** Re: timber optimisation hub, Development Application (10-2020-81-1)  
**Date:** Wednesday, 13 May 2020 3:16:28 PM

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To General Manager  
Bega Valley Shire

I oppose the building of a new sawmill to be a part of the Eden wood chip mill.

It seems we have forgotten that our whole region has just been on fire. Such a short time ago. Do you want a reminder of New Year's Eve 2019? Fire everywhere around my little house at Mossy Point. So terrifying.

We cannot return to business as usual. We cannot ignore the temperatures that are getting hotter and hotter.

There is so little forest left in both Bega and Eurobodalla shires. So few habitats for animals.

We need to use wood from plantations for the wood chip industry. Please do not cut down any more native trees. I implore you.

Regards, [REDACTED]

Sent from my iPhone

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Cc:** [bega@parliament.nsw.gov.au](mailto:bega@parliament.nsw.gov.au)  
**Subject:** Eden woodchip mill  
**Date:** Monday, 11 May 2020 2:16:08 PM

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I DO NOT want to see want an expansion of the Eden mill's activities. The mill is already decimating huge areas of our forests and releasing large amounts of carbon into the atmosphere with its woodchipping. We need to be growing forests to deal with the climate chaos not destroying them. More than 80% of South Coast forests were burnt in the summer bushfires, the forests of our region simply cannot support this expansion.

I DO NOT believe the argument about lost jobs is valid. In 2019 Blue Ridge Hardwoods, with 55 employees lost the Eden sawlog Wood Supply Agreement to the woodchip mill and is now in the process of closing. The mill will employ 20, according to the DA.

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.

I urge you to reject this DA submission.

[REDACTED]

Narooma

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** stop wood chipping D A  
**Date:** Tuesday, 5 May 2020 10:23:14 AM

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When Council votes , please do not approve the Development Application to extend further wood chipping at the Eden Mill .....

Sincerely,

[REDACTED]

[REDACTED], Tathra

Sent from Windows Mail

**From:** [REDACTED]  
[RecordsMailbox](#)  
**Subject:** Submission re Timber Optimisation Hub, DA (10-2020-81-1)  
**Date:** Friday, 15 May 2020 12:27:01 PM

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To Whom It May Concern,

I am writing this submission to oppose the Timber Optimisation Hub, DA (10-2020-81-1). There are a number of reasons why this application should NOT be approved.

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 m<sup>3</sup>/a. Ninety six percent of hardwood sawmills in Australia are less than 45000 m<sup>3</sup>pa 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-naturalwood-exports-pty-ltd-hardwood-forests-sawlogs.PDF](https://www.forestrycorporation.com.au/_data/assets/pdf_file/0006/1214637/allied-naturalwood-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.

Thank you for reading and considering these reasons why the Timber Optimisation Hub, DA (10-2020-81-1) should NOT be approved.



Bega Valley resident

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Fwd: Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Tuesday, 12 May 2020 11:24:52 PM

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Dear General Manager,

I am writing this letter concerning the Timber Optimisation Hub, Development Application (10-2020-81-1).

As a Traditional Owner of the Yuin Nation and a Cultural Fire Practitioner, the approval of this Development Application would bring high stress and anxiety to the Traditional Owners of the Yuin Nation as this would mean that more of our traditional lands will be miss managed through deforestation.

It has been our cultural obligation to care for Country for thousands of years, and with the impact on Country, Communities, Sacred sites and Wildlife with the recent summer bushfires, the approval of this application would be devastating to the Aboriginal community as we still hurt deeply from the devastation of the recent bushfires.

Having 18 years of bush firefighting experience with NPWS and being a known Cultural Fire Practitioner of the Yuin Nation, the approval of this application would create significant bushfire risk to the whole community of the Bega Valley in years to come due to the increase of fuel loads and ladder fuels generated from regrowth forests.

Regards

[REDACTED]  
Cultural Fire Practitioner and Traditional Owner of the Yuin Nation.

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Tuesday, 12 May 2020 11:48:18 AM

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To whom it may concern,

As a resident of the Bega Valley Shire it has come to my knowledge of the DA application from the Allied Natural Wood Exports on the expansion of the Eden woodchip mill. I propose a few concerns.

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

2. 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.

3. 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. I thought in the aftermath of this devastation the forest should be able to regenerate and not be logged further.

4. .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. Shouldn't for the benefit of jobs and people in our Shire we find ways that can put our own residents back on their feet?

I ask that you rethink the approval of this DA, taking in account the high impact it will cause to the wildlife and residents of the Bega Valley. I thank you for your time. Regards

[REDACTED]



## **Objection to Allied Natural Wood Exports (ANWE) application for saw mill development**

### **Scope**

I welcome the commitment of Bega Valley Shire to the planning process in seeking community input into development decisions within the Shire. This is a particularly important process for ensuring significant developments are *bona fide*, and in the public interest. Where corporate shadowing and undue influence sways or circumvent good planning and economic development the public comment process must be able to rail-road and cover-ups. Often seemingly innocuous decisions on the surface can appear logical, while coercion or longer term economic implications are less than recognisable or out of reach to the general public.

Thank you for taking the time to engender the public comment phase, and in considering these issues, and the view expressed below.

### **Confidential**

Please keep my personal details discrete and anonymously recorded, in the spirit of commercial in confidence. However, the spirit and content of the comments here should be open and 'on the table' for all to consider.

### **Credibility**

I regularly work in the Bega Valley area, and know some areas and communities intimately. I have had business connections with the forestry industry in the greater Bega Valley for > 15 years. A training and background in science and forestry underpins my work in the area.

Strong environmental performance and commitment to the community and environmental management are trademarks of respected forestry enterprises and large developments in any regional area. This decision and the benefit it promises to Bega Valley is no different. Yet, it is fundamental to ask if anything smells fishy. In answering this question history provides many clues as to what is at stake, and what has happened. Maybe this is no different this time round...

### **Position**

I fully support integrated sawmill development – something to compliment well run wood chipping operations. Such multiple-use of natural resources is smart and makes good business, and is moral use of finite resources, that also instils a natural moderator in the system for 'checks and balances'. In fact, well run sawmilling and wood chipping operations go hand-in-hand. Together they compliment the financial management and the forest operations of the use of the forest.

Except in this instance, the ownership is too close. To have the wood chipping facility own the sawmill is back to front, is the cart-before-the-horse, or in the vernacular - the tail wagging the dog. The incentive should be first to cut timber from any log, then fall-down logs go to the chipper to recover every last fibre of harvested wood.

However, as demonstrated above, wood chipping is far more profitable than saw milling because historically in Australia the resource has been ridiculously under-valued. Here-in lies the problem... the wood resource that has historically been 'given' to the wood chipping operations, and therefore precedent has set a really attractive benchmark price for raw wood fibre.

Whilst ANWE are quick to argue that their proposed sawmill operation will help optimise their operations, and will provide an on-site system to offset good logs being pulped, the reverse is far more likely, being that good logs will get chipped. The temptation will be to gobble everything as pulpwood, and thereby to cover extra forest area in boom times, logging more area in the quest from improved profit.

The pulpwood industry has also blind-sided us with the argument that production costs for thermo-mechanical or thermo-chemo-mechanical wood chipping demands a resource of low input cost. But this is best described as bunkum – the reality is that pulp and paper producers are drunk on finding a supply of wood fibre at low cost that sustains the healthy wages and incomes of the forest company executives and workers that rape and pillage our bush, and the profitability of the sector more generally. The Australian context is also really favourable to off-shore pulp and paper manufacturers – as our country is located favourably in terms of transport distance, our Government is (relatively) stable, and our Government is willing to enter into long-term deals for extensive natural resource 'mining' – giving the wood processors the holy grail of resource certainty.

### **Historical input costs – benchmarking the value of wood fibre**

All up, the value of the logs delivered to the wood chip mill in Australia is between \$1 & \$10 / tonne. In terms of finished paper product, every \$1 input of logs for pulping becomes \$150 - \$1,500 prior to tertiary use (re-manufacturing, cutting, folding, printing & embossing). In a good pulping operation the profit multiplier can be \$16 for every \$1 of wood input – assisted by the scale and mechanisation of the operation. Pulping is profitable !

Sawmills on the other hand have usually cried poor – that their resource is too expensive. Typically sawmills have paid between \$20 and \$120 /tonne for their log resource (though this is falling – in part due to a decreasing log size – over harvesting). And logs are getting smaller because demand has been high and over the last 40 years access to forested areas has been restricted by an increasing National Parks estate – particularly on the NSW South Coast. Ironically, demand usually pushes price up, but the timber industry has been protected from this basic law of economics – probably by some overtly efficient lobbying and coercion. Similarly, \$1 of wood input in a sawmill sells for between \$250 - \$2,500 /tonne on the wholesale market. In contract the profitability of the sawmill is rarely better than \$5-\$8 per \$1 of wood input.

Both processes convert only between 50% and 70% of raw product taken at the mill gate into their nominated output. In the past 20 year there has been great developments in reconstituted wood products – helping efficiency of both processes in recovery of wood fibre and therefore revenue.

Through the disparity of higher input costs for sawlogs there has been an underlying incentive in the industry to utilise every splinter of these more valuable logs for its best possible economic return. Through such systems we have had huge innovations in sawlog re-processing, and even in recovery of sawdust to on-processors such as pulp and paper manufacturing. This is good natural resource use, and works best when mills are co-located.

However, if the facilities are co-owned this becomes profoundly more awkward. The temptation is to row the easy road – put any awkward log down the chipper, and make more profit putting logs down the chipper. This would be amplified in sole-ownership facility, but relies on clear delineation of what makes the grade as a sawlog being used as a sawlog. If the chip mill owns the saw mill, is it not easier & quicker to send any or all logs down the throat of the chipper ?, destined for Japan or Asia for paper manufacture, and then return it to Australia for massive profits.

## **Rationale**

If forestry wants a sawmill, then the best people to manage a sawmill, are saw millers. And forestry needs to work with Blue Ridge Timbers to make this a partnership. Forestry has never been an overly profitable industry, and probably never will be. But changes in the structure of the State owned Forestry Commission over the last 10 years probably lead us to an answer – based on the trail of money.

The question that comes to mind first is ‘why did Blue Ridge Timbers get rolled? And if Forestry argues it was unprofitable, or that the processor could not come to the party with an ‘acceptable’ price for wood, then where is Forestry in assisting transparency for the District, the Region, and the State. I put it to the Bega Valley Shire that the summer of bushfires was a gross inconvenience to Forestry – who wanted more money for sawlogs than Blue Ridge timbers was going to offer. Obviously Forestry has coerced a more acceptable (to them) price from ANWE.

So, I fear that the incentive for Allied Natural Wood Exports (ANWE) is all about profit. If ANWE secures a sawmill in their Twofold Bay facility it will definitely help them, and it will definitely help the Forestry boffins get fat on the increased wood sales. However, it is not in the best interest of processing or wood production in Australia. It will definitely not be in the best interests of resource value, nor management of natural environments and natural systems. It will lead to increased timber harvesting, smaller trees, and increased regularity of harvesting. In terms of fire management, more mechanical disturbance is likely to mean more intense fires, and a reduction in green canopy is a proven factor leading to increases in factors that cause climate change – increased reflectivity, increased heat and increased use of fossil fuels.

## **Summary**

Please say no to Allied Natural Wood Exports application for a sawmill. While a sawmill run in conjunction with a wood chipping operation makes good economic sense, and would be good for the Region, the decision for the sawmill should precede (and did) the decision for a wood chipping operation. However, Forestry angled to refuse supply to Blue Ridge Timbers – for reasons only really know to themselves.

In this instance I would not like to see Dracular take charge of the Blood Bank (ANWE take all wood input on the South Coast of NSW). A far more preferable outcome for good rural regional economics, jobs, better environmental management, and improve resource utilisation would be to require Forestry to reconcile differences with Blue Ridge Timbers, and reinstate that sawmill, at arm’s length from ANWE. Such a facility could be co-located if preferred @ the Two Fold Bay facility.

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Eden wood mill  
**Date:** Tuesday, 12 May 2020 6:12:22 PM

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I strongly oppose the Eden wood mill. Eighty percent of the south coast forests were burnt. We need to regenerate forests, not destroy them for a handful of jobs. Climate change is a serious and real issue.

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** TIMBER OPTIMISATION HUB must NOT BE ALLOWED TO PROCEED  
**Date:** Wednesday, 13 May 2020 7:56:57 PM

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To the Manager, Mayor and Councillors of Bega Shire Council

I implore you all to realise the importance of the flora and fauna of this region, as it is one of THE BEST REMAINING CONCENTRATIONS of amazing ecology, as 'we' have managed in 200 years to basically destroy 95% of the forests of Australia.

The people of this region, including those I speak to involved in the Forestry Industry, agree that the mis-management of the forests is NOT ONLY DESTROYING increasingly rare habitat, but also causing the Outrageously Bad Bush Fires.

Forestry practices were at their best during the 1960-70's and since then there has been a steady decline in nearly all aspects of forest management, as it has been increasingly mechanised and also since CHIPPING has been included in the "processing" and the demise of small, local operators that actually cared for the forest and habitat.

Bring back a network of small mills, milling in the forest, with selective harvesting, and support the redevelopment of Grand Stately Forests, that will result in a SUSTAINABLE INDUSTRY that will continue forever, that will greatly reduce the number and severity of fires, and also provide opportunity for Tourism, Homes & Livelihoods.

DO NOT APPROVE the DA for the new facility as it will provide ONLY 20 jobs, increase the number of trucks on the road, result in the destruction of the forests. This Business Structure is aimed at SHORT TERM GAINS, a BIG WASTE of money (\$20m of tax payers money). What we need is a total overhaul of Forestry NSW and a smart incorporation of the best of the old and new practices.

I speak for over 1000 people I have personally spoken with over the last 2 years, that have all agreed with the above,

I ask you to act for the sake of future generations and for the Sustainable Development of this Region, and ask you to refuse to approve or support the Proposed Optimisation Hub.

Thanks you,

[REDACTED]  
resident of the South Coast 20 years.

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Re: DA 10 - 2020 - 81 - 1 Timber Optimisation Hub  
**Date:** Wednesday, 13 May 2020 10:14:43 PM

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The Subject DA should not be approved.

For a Council that has legitimately declared a Climate Emergency it would be a total contradiction to approve any development that allows continuing destruction to our already 80% devastated south-east forests.

Our global warming has reached such a crisis point of increasing drought and drying of our landscapes that in March 2018 my 40 acres of cared for country was burnt due to:

Negligence by Origin Energy (and I provide my own solar power!)

and

50 years of continual destruction and mismanagement of our native forests and the life within them, resulting in ever drying conditions, so that when there is Corporate or private negligence everything surrounding for thousands of acres is destroyed. It is scientifically recognised that native logging practices have caused our crippled-by-human-activity remaining forests to be more fire prone and those eventuating fires to be far more extreme and destructive, exemplified by the summer 2019/2020.

Our nurturing habitat trees are nearly all gone, no surprise Australia has the greatest record of species extinction.

Our unique fine quality timber trees are trashed into wood chips by machines for 1% of their actual value and if processed to fine quality timber, not only would the value be exponential but the number of people employed far greater.

It would now be criminal to trash native forest trees for wood chips. It would now be criminal to interfere in burnt forests through a sole-interested Corporate Timber Optimisation lie that is totally debunked by Australia's leading experts in forest ecology.

Can the Bega Valley please now recognise what catastrophic damage has been done and use this desperate time as a catalyst to make a total U-turn to learning and caring for country, to rehabilitate with knowledge resulting in a landscape and ecosystems of far greater value.

Sincerely,

[REDACTED]



Bega NSW 2550

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Submission: DA 10-2020-81-1  
**Date:** Tuesday, 12 May 2020 6:41:42 PM

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

Submission from [REDACTED] BEGA NSW 2550

There are many compelling reasons to reject this development application.

Council has an obligation to assess an application of this nature on its impacts to the entire shire, its natural environment and its communities. Not just limit itself to Lot 16 DP 1066187  
These impacts are significant and should not be ignored.

One of the most significant is the continued destruction of our native forest and their degradation through continued logging. The fact that the summer fires have burnt over 80% of our forests, and that the severest of these fires occurred in areas that had been wood chipped over the past several decades, should be taken into account. The latest science reports conducted in Australia, clearly show a significant increase in fire risk to areas that have been logged. Bega council has an obligation to protect its citizens from the ravages of wild fire, not allow developments that place those citizens in further danger.

The development does not fit into the councils Climate resilience strategy. The development has significant impacts on our future climate. The consequences for our native forest and wildlife, the impacts on water and the increased CO2 emissions have to be considered.

The development also creates a monopoly situation for ANWE, and will if approved result in the employment of less people, and the entitlement to every tree in the state forest region to one company.

I urged the Bega Valley Sire council to act in the best interest of its citizens, not in the interest of a few individuals, and reject this proposal.

Sincerely

[REDACTED]



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Cc:** [REDACTED]  
**Subject:** Eden woodchip mill  
**Date:** Wednesday, 13 May 2020 8:44:34 AM

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I understand that Bega Valley Council is considering an expansion to the Eden Woodchip Mill. Give the devastating consequences of drought and the bushfires of 2019\20 I encourage Council to consider the broader social, economic and environmental consequences of this application.

Our long term future relies on healthy environmental systems and economic development that casts us into smart future, not outdated industries that do not reflect a world where climate change is real and here.

We can not afford to lose more native forests to an industry that is not about value adding but rather about simple and devastating exploitation of precious resources.

It would be great if our south coast region could lead the way in smart decision making and forward looking development that consider future generations.

[REDACTED]

[REDACTED]

In light of this year's disastrous bush fires and the growing threats of serious weather events due to Climate Change, I believe any further extraction of timbers from our forests is a danger.

Thirty years ago scientific research suggested that modern timber extraction processes would lead to more fire-prone forest environments. We should not continue to go down this path, further endangering the lives and property of people whose homes, businesses, farms and livelihoods which become threatened by wildfires.

Since the rain which quenched the fires in February there has been little rain in areas which were in drought before the fires. This summer could be another dry time thus increasing the risk of more catastrophic events.

The local communities voted against the suggestion of a wood-fired power station fueled by the local timbers, and the idea of producing briquettes from our precious timbers is an anathema. Briquettes produced from waste materials, e.g. coconut shells and olive tree prunings, are already available cheaply on the market. To burn our forests for such a project would be an environmental crime.

Governments seem to be pushing to dilute environmental laws at the moment, using the excuse of the Cov-19 virus pandemic. This leaves us with the potential for more problems with fires and water distribution.

**From:**



**To:**

[RecordsMailbox](#)

**Date:**

Sunday, 10 May 2020 1:01:46 AM

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To Bega Valley Shire Council,

I 100% support the expansion of the Eden Woodchip Mill. A fabulous company which employs so many people and supports so many local families.

Regards,



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Sent from Gmail Mobile

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Timber DA  
**Date:** Thursday, 7 May 2020 3:19:13 PM

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Dear Bega Valley Shire Councillors.

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

I am writing to voice my objection to the above Development Application.

I believe that this proposed development is not just about building new buildings to replace those lost in the recent bushfires. It is about increasing capacity of the Allied Natural Wood Exports to mill saw logs and therefore increase native forest logging. 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.

I object to increased native forest logging on the following grounds:-

1. This is completely contrary to council's undertaking to the community to address, in all ways available to local government, the existential threat of climate change via the Climate Emergency Declaration (CED). While the (CED) unfortunately does not go far enough because it excludes climate mitigation action in the agriculture sector, it's intent is crystal clear: the people of the Bega Valley want action on climate change. Approval of this development would be to ignore the wishes of the constituency you represent. Also the CED was passed before the horrendous summer bushfires. One can only assume that sentiment around climate change mitigation has increased since Bega Valley Shire residents saw first hand the effects of a warming climate. This is set to worsen in coming decades.
2. The science of connection between native forest logging and climate change is also crystal clear. Leading Australian forest ecologists such as David Lindenmayer have demonstrated that native forests are the best means of carbon sequestration and also of moisture production ie rainfall. All Rural Fire Service leaders, past and present, agree that the recent bushfires were due to the unprecedented dryness of the forest due to the long running drought. The long running drought was, in turn, the result of climate change. To increase logging operations can only aggravate this cycle.
3. The financial cost to the three tiers of government of cleaning up the bushfire damage and repairing public infrastructure was offset by the generous donations. This is unlikely to occur year in and year out, so the full cost of bushfire recovery in the years to come will be born by government. Add to this the economic loss through greatly reduced tourism

when tourism is a sector on which our Shire depends and the financial cost far outweighs the benefits of this development to our Shire.

4. We are advised that more than a billion native animals lost their lives in the recent bushfires. Millions of hectares of habitat have been destroyed. Those animals who survived have a much reduced habitat in which to feed and hide from predators. All logging in burned forest with regenerative potential and in unburned forest, must be immediately halted while a thorough assessment of the loss and recovery strategies, are carried out. Enabling any increase in forest logging via this development is tantamount to killing native animals, which is illegal apart from being cruel and immoral. I hope there are no councilors who condone harming native animals via any means.

5. I have heard some people say things like “we have to burn the bush before it burns us”. This is completely contrary to the science of forest ecology, climate change and bushfire. While it may be true that if we concrete the entire Bega Valley we would effectively mitigate bushfires risk, it is equally true that nobody would live here if that were the case. And ecological problems of other kinds would arise. Our response must be consistent with the science. Any prescribed burning, were it to take place, must be led by Indigenous people with traditional knowledge of how to care for country.

And all this to produce woodchips for export.

I call on all councilors to rationally consider all ramifications of this development application and deny it on the grounds of the massive ecological damage it will do to our Shire, the economic damage that will flow on from that. This is all according to the science. Furthermore the continued decimation of our native animal populations through habitat loss is something councilors must not countenance under any circumstances.

Yours sincerely,



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

 Tathra

I object to the DA for the following reasons:

1. The logging of native forests must stop. Climate change has caused a major drought in our region leading to horrific fires and consequences over the 2019/2020 summer. These issues have not been addressed satisfactorily in the DA.

‘Heavy logging and burning of forests increases rather than decreases flammability. Forests permitted to exist in their natural state (with dense shading canopies and intact boundaries) lose less moisture from drying wind and direct sun. An unlogged forest can remain cooler and damper - for longer. It has been demonstrated that it can slow, and even halt a fire.’<sup>1</sup>

Plantations timber should provide for the mill’s needs.

2. Eden is a stunning bay and surrounding district. Tourism, with an emphasis on wilderness, should be encouraged rather than disadvantaged. The general eyesore and out of bounds area of the chipmill could change into a world class vacation destination. Landscapes such as the one photographed on a visit to the Light to Light walk rob this area of these possibilities.<sup>2</sup>

3. Wildlife has been severely affected with the fires and will not recover as much as is possible with further logging and destruction of native habitat.

4. The Council’s Climate Resiliency Strategy is not aligned ethically with this DA.

5. As a ratepayer I do not want to subsidise this company in any possible way, monetarily or otherwise. Timber Optimisation Hub should be renamed Future Shredder.

<sup>1</sup> Department of Wildlife Ecology, University of Maine, Orono, ME, USA

<sup>2</sup> Road leading to Saltwater Creek, November 2019



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Eden "Timber Optimisation Hub" Development Application  
**Date:** Wednesday, 13 May 2020 9:53:01 AM

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To Bega Valley Council,

I am writing to oppose the expansion of the Eden "Timber Optimisation Hub" otherwise known as a wood chip mill.

How, after the mass decimation of our forests, council and the NSW government felt that this is a socially and environmentally responsible decision is beyond comprehension.

The huge Border blaze has burnt more than 160,000 hectares south of Eden, much of that area according to a forest ecologist is the "most heavily logged land" in Australia since the 60s and we still haven't learnt to save what little we have left.

"The map of the Border fire pretty much overlaps the same area that's been logged."

Excerpts based on information from a long term ANU study you are all aware of and yet continue to ignore follow:

Forests that have been logged and regenerated are significantly more likely to burn at higher severity.

Older forests are harder to burn because the trees are wetter and further spread apart.

Logging replaces the old giant trees with younger ones that look like toothpicks, grow closer together and dry out the soil and act as kindling.

Logging removes most of the water from the landscape and replaces it with small dry kindling.

The forests grow back more fire-prone and remain that way until they become mature which can take 100 years or longer.

We don't have a 100 years, the forests will have been logged and burnt again well before then.

At what cost 20 jobs?

Please show some leadership and care for EVERYONE and EVERYTHING both now and those still to come in the years still to come.

[REDACTED]  
Bendalong NSW 2539



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Friday, 8 May 2020 7:12:37 PM

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Leanne Barnes  
General Manager  
Bega Valley Shire Council

## **Submission to Bega Valley Shire Council**

Dear Leanne,

Please regards the following points as my submission regarding the above **Development Application (DA)**

### **1. 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, and obviously no meaningful changes were made to reflect the damage done by them. In the summer bushfires, eighty percent of the forests available for logging were burnt. An estimated one billion animals were killed. The forests of the region were already over logged and there are serious doubts about whether the forests can supply enough resource to make the industry viable.

### **2. 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 dismisses it as a matter to be considered; another that this project is not residential. This raises ethical and possibly legal issues around approval of the DA.

### **3. 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 the woodchip mill and is now in the process of closing. The new mill will employ 20, according to the DA.

### **4. This Development Application is not just about approval for 3 Colourbond sheds.**

This application is about providing the means for the woodchipping industry to tighten its grip on the native forests of the entire South Coast and East Gippsland. The development would make this one of the biggest native forest sawmills in Australia, processing 60,000 m<sup>3</sup>p/a. Ninety six percent of hardwood sawmills in Australia have less than 45000 m<sup>3</sup>pa throughput. - [ABARES 2019](#))

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

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

If Allied Natural Wood Exports (ANWE) were to be awarded this project, it gets contractual entitlement to every single tree in State Forests in the region and the approval to cut them down. Indeed, it is a condition of the new Wood Supply Agreement, commencing 1 January 2020, between ANWE and the NSW Forestry Corporation that it meets certain milestones in building this new facility. .  
[https://www.forestrycorporation.com.au/\\_data/assets/pdf\\_file/0006/1214637/allied-natural-wood-exports-pty-ltd-hardwood-forests-sawlogs.PDF](https://www.forestrycorporation.com.au/_data/assets/pdf_file/0006/1214637/allied-natural-wood-exports-pty-ltd-hardwood-forests-sawlogs.PDF)

Monopoly is not healthy in any industry sector, and this is different because it is dealing with resources In Commons, not any commercial or manufacturing sectors.

**6. 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.

**7. The footprint of this new mill would 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 wider 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. Therefore, it appears to be avoiding restrictions by stealth and lack of transparency.

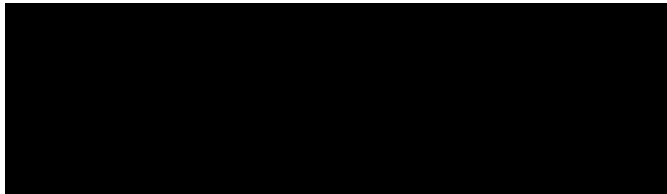
**8. Summary**

The Regional Forest Agreements and the Wood Supply Agreements that are linked to them, have decimated our In Commons resources of native forests, flora and fauna over more than the last 40 years, more recently in an industrial scale. The jobs have been mechanised and reduced in number though those remaining are seen as traditional and therefore sacrosanct and to be retained at all cost – the cost of these fewer jobs has multiplied exponentially to unprecedented heights, as a result.

Lastly, to contemplate approval of this DA is to compound faulty and unsustainable business and forestry management practices into the future, which is to threaten clean water and air, level of rain fall, natural habitat and resilience of our environment for future generations.

All in all, this DA is counter to the Climate Emergency already declared by BVSC

Kind regards,



"(All) truth passes through three stages. First, it is ridiculed. Second, it is violently opposed. Third, it is accepted as being self-evident." *Arthur Schopenhauer*



I wish to acknowledge the Traditional Custodians of the lands and waters of the Bega Valley Shire - the people of the Yuin nation - and pay my respect to elders past, present and emerging.

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Submission re Timber Optimisation Hub, DA (10-2020-81-1)  
**Date:** Tuesday, 12 May 2020 9:44:12 PM

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To Whom it May Concern,

**I am writing this submission to oppose the Timber Optimisation Hub, DA (10-2020-81-1). There are a number of reasons why this development should not be given approval.**

**1. Effects from bushfires have been ignored.**

This DA is ignoring the fact that 80% of the forests available for logging were burnt & destroyed by the summer bushfires. With the region's forests already over logged and now recently destroyed by bush fires, supply of forests is short, meaning the saw mill is likely to not even be viable. Scientists have estimated that one billion animals were killed in the bush fires. Salvage logging will have terrible and irreversible consequences for forests and the remaining wildlife trying to recover from the fires. We need to stop animal and plant species from becoming extinct, not put species at further strain and risk extinction. There is scientific evidence that logging greatly increases the risk and severity of bushfires.

**2. The negative impacts that contribute to climate change have been ignored.**

Last year the Bega Valley Shire declared a climate emergency and developed a Climate Resilience Strategy. I acknowledge that Council has no say over the timber industry. This DA, however, clearly would contribute to the dire effects of climate change, especially by increasing CO2 into the atmosphere & reducing the amount of CO2 absorbed. This DA ignores the over whelming scientific evidence on climate change and how protecting native forests is an important way to reduce CO2 in our atmosphere.

**3. It is the opposite to other alternatives and strategies that could actually make our region more resilient to climate change. Continually logging native forests is not sustainable.**

We need to look after the home & preserve a healthy place for the future, whether it be for animals, plants, trees, people and future generations. Preventing erosion, & looking after the water quality in our region's creeks, water ways and soil quality is vital. Allowing plants and trees to re-sprout after the fires, leaving wood, logs for habitats for animals, birds, insects is critical. A healthy biodiversity matters for humans. Instead of negatively impacting on our native forests, let's create jobs that are sustainable for people in the region, like ecotourism, seaweed farms (as Tim Flannery recommended), or a recycling plant. Plantation timber can be farmed in areas that are already cleared.

**4. This forest sawmill will negatively impact the environment beyond its fences.**

The DA does not consider the environmental impact regarding air quality, noise, water quality, vehicle traffic beyond the immediate area. The impacts will be felt beyond the fences of the sawmill.

**5. The DA approval will reduce jobs in the area, and they will not be sustainable jobs for our environment.**

Blue Ridge Hardwoods losing the Wood Supply Agreement to ANWE, meant 55

employees lost their jobs. The DA states that ANWE will only employ 20 people. Future jobs for future generations need to be sustainable, so that we all have a healthy place to live in and work in, in the future.

**6. Approving this DA will create one of the largest native forest saw mills in Australia.**

It is not just about approving a few buildings. It opens up the South Coast and East Gippsland native forests for further irreversible damage.

Thank you for reading my submission.

Yours sincerely,

A solid black rectangular box used to redact the signature of the author.

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** No further rubbishing of the forests and its fauna.  
**Date:** Saturday, 9 May 2020 4:17:54 PM

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Hello Councillors, how can you consider any continuation/expansion of the Eden chip mill after the devastation and loss of species this past summer. Don't you think its time species extinction was addressed and loss of native forest was countered. Eden needs any other industries but not these.

[REDACTED] BEGA

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Objection to DA - Allied Natural Wood Exports  
**Date:** Wednesday, 13 May 2020 8:34:43 PM

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Dear General Manager,

My name is [REDACTED] and I am writing to you in opposition to the DA lodged by Allied Natural Wood Exports

It is completely unfathomable that just months after the bushfires devastated our region that such DA would be approved that would mean the end of the last of our surviving forests.

As I am sure you would agree this past summer was traumatising to say the least. We are reminded everyday of the effects of the bushfires on the prehistoric forests that were brunt to a crisp. Not to mention the billions of animals that were lost and the ecosystems that will take hundreds of years to recover. We cannot let the last of these precious forests be logged for wood chips...

If this DA is approved it will mean that Allied will have the monopoly of the industry and have rights to every tree that is logged without opposition. I don't support the timber industry at all, but the fact that this development doesn't even create healthy competition raises alarm.

This industry just takes from the environment and their sustainable practices are non existent.

The DA does not clearly specify that the areas logged will only be plantations. There needs to be clearer restrictions on their access and ability to log.

The DA also states that the mill will only employ 20 people! This is insane. At least make them actually have some positive impact to the region by employing locals.

We have an opportunity to be at the forefront of the climate action movement and make real change for our futures. Don't make us go backwards by failing to prepare for the future. What happens when they log all our forests and tourism to the region stops because the area has been savaged by loggers?

The council should be encouraging more future focused business to the area with grants and support to create a thriving economy for us all. You should be doing everything you can to preserve our INCREDIBLE region and create a future that is something to be proud of by protecting our environment and it's inhabitants, both human and animal.

i look forward to hearing your response to this mater.

Best regards,

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Development Application Wood Chip Mill  
**Date:** Tuesday, 12 May 2020 8:49:02 AM

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As a frequent visitor to the Bega Shire and surrounding countryside, I feel compelled to contact the council on this proposed future development at wood chip mill.

On my many trips to and from Edrom Lodge, I have noted the unbelievable amount of logging trucks on this road, sometimes being unbearable.

As a tourist you just want to enjoy the countryside in all its beauty, the last thing you need or expect is a continual stream of logging trucks pounding the road.

I feel with the proposed application for new development this can only compound the current situation.

The quality of one's time spent in the area will be diminished making you question the reason for holidaying in the region.

As councillors you have a duty of care to uphold, both to your constituents and tourists.

With ratepayers and renters alike, both reeling from recent bushfires and now corona virus, so busy keeping themselves safe. It would suggest aspects of the council could be taking advantage of this, pending application approval.

This would not seem progressive in a tourism rich region.

Yours respectfully

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Eden mill expansion submission  
**Date:** Wednesday, 13 May 2020 12:44:48 PM

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Dear members,

After our recently shared bushfire experience it has become clear that we need a new and comprehensive approach to forest management in the BVS and more widely. This approach needs to be formed with the caring of our community and the environmental needs of our area as its primary focus. It is unreasonable to think that this focus could be either formed or maintained with the pressure of a large business investment and its associated interests in the mix.

I submit to you that there are long term and more universal priorities that have a unique chance in this post bushfire moment to be nurtured by your policy decisions. There are numerous strong indications that we have to evolve our approach to our environment and how we interact with it. An expansion of commercially motivated logging interests in the region is not compatible with this nor with evolving community sentiment towards it. I ask that your decisions reflect the new paradigm we find ourselves in and protect the lives and future livelihoods of the humans, animals and plants under your care.

[REDACTED]

Cc: bega district news



**From:**



**Subject:**

Submission/ against chipmill expansion

**Date:**

Tuesday, 12 May 2020 9:53:08 AM

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I am against the expansion of the eden chipmill,

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

2. 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.

3. 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.

4. 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.

5. 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.

6. 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.

7. Chipping industry ignores environmental laws and mismanages coupes which

increases fire risk, as seen in the border fire  
8.

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** 2020.81 environment east gippsland submission Eden mill - DA - submission from EEG  
**Date:** Thursday, 14 May 2020 10:41:10 AM  
**Attachments:** [image003.jpg](#)  
[ANWE-DA-EEG-14-5-20.signed.pdf](#)

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Dear Council staff,

Please find attached the EEG submission to the DA for the sawmill, briquette factory and pellet plant at the Eden woodchip mill.

Regards,

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Wednesday, 13 May 2020 4:43:31 PM

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

Submission to Bega Valley Shire Council

General Manager and all Councillors,

I strongly object to this development on a number of grounds, including that it is inconsistent with the objects of the NSW Environment, Planning and Assessment (EP&A) Act, in particular:

(a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,

(b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,

(e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats.

I also believe that it does not meet the heads of consideration under Section 4.15 of the EP&A Act, which outlines matters that a consent authority must take into consideration when determining a development application, because:

1. it is inconsistent with the objectives of the Bega Valley Local Environment Plan 2012 (LEP) in relation to the IN1 General Industrial zone which aims to encourage employment opportunities and to minimise any adverse effect of industry on other land use and the heritage conservation clause which aims to conserve the environmental heritage of Bega Valley; and
2. it is not in the public interest.

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. 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 over logged.

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.

Jobs will be lost in local sawmilling. In 2019 Blue Ridge Hardwoods, with 55 employees lost the Eden sawlog Wood Supply Agreement to the woodchip mill and is now in the process of closing. The mill will employ 20, according to the DA.

This DA would allow 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.

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

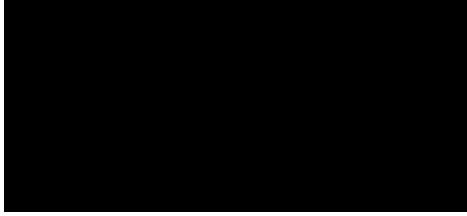
If Allied Natural Wood Exports (ANWE) gets this project approved, it gets contractual entitlement to every single tree cut down from State Forests in the region. Indeed, it is a condition of the new Wood Supply Agreement, commencing 1 January 2020, between ANWE and the Forestry Corporation that it meets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

This proposal stops a transition to plantations for the wood chip 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.

I ask that the council refuse this DA.

Yours sincerely,



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Monday, 11 May 2020 1:27:23 AM

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PLEASE stop the LOGGING of forests in your country! The animals need their homes, please stop before there are no animals left!



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Cc:** [REDACTED]  
**Subject:** FW: Submission on DA (10-202081-1)  
**Date:** Wednesday, 13 May 2020 8:51:51 AM  
**Attachments:** [image001.png](#)

---

Hi Records

This is a submission for DA 2020.81. Timber Optimisation Hub  
(not sure why communications area were sent this)

Please register .

[REDACTED]

[REDACTED]



We wish to acknowledge the Traditional Custodians of the lands and waters of the Shire  
- the people of the Yuin nation and show our respect to elders past and present.

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**From:** [REDACTED]  
**Sent:** Wednesday, 13 May 2020 8:35 AM  
**To:** DA Hub  
**Subject:** FW: Submission on DA (10-202081-1)

Hi there, I think this one is for you.



We wish to acknowledge the Traditional Custodians of the lands and waters of the Shire  
- the people of the Yuin nation and show our respect to elders past and present.

**From:** [REDACTED]  
**Sent:** Tuesday, 12 May 2020 11:08 PM  
**To:** Communications <[Communications@begavalley.nsw.gov.au](mailto:Communications@begavalley.nsw.gov.au)>  
**Cc:** [REDACTED]

**Subject:** Submission on DA (10-202081-1)  
Timber Optimisation Hub, Development Application (10-2020-81-1)  
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 m<sup>3</sup>/a. Ninety six percent of hardwood sawmills in Australia are less than 45000 m<sup>3</sup>/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](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.

**8. Native forests are valuable for tourism**

Logging practices detract from the appeal old growth forests provide for visitors to the South Coast. The flora & fauna of our native forests attract tourists and increase tourism employment opportunities.

Regards

  
Sent from OPPO Mail



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Submission - DA Application  
**Date:** Friday, 8 May 2020 12:40:31 PM  
**Attachments:** [submission.pdf.pdf](#)

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Hello,

I just submitted a submission in regard to Timber Optimisation Hub Development Application 10-2020-81-1. I did this from your website. However as i am not sure that it was successfully sent, I have attached it below.

I am a Bermagui resident, have made no donations to any political group, or have any affiliations with any.

I am very concerned about the state of our forests and the effect the granting of the DA would have.

I hope my submission is given consideration.

[REDACTED]  
[REDACTED]  
[REDACTED]  
Bermagui 2546  
[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Eden woodchip mill expansion  
**Date:** Wednesday, 13 May 2020 5:03:31 PM

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Bega Valley council

Dear Councillors,

I am not an environmental academic!

I am a retired teacher, long associated with the Swanhaven area. And areas further down the coast.

I am VERY concerned about the DA of Allied Natural Wood Exports to expand their operations. To build a bigger and better sawmill. to create a monopoly on native timber supply. First, South-East Fibre Exports, then Blue Ridge Hardwoods fell to this group. To support a monopoly, is un-Australian. Australia does not need monopolies.

Concerning to me are the housing arrangements proposed for all the new equipment : tin sheds basically. Not suitable for noise abatement/containment. Also of concern are 2 statements in the documents: one claims the log-loader won't be housed, another claims it will. And the noise from increased truck traffic will be...awful.

Air pollution is a great concern. Whilst averages and measurements are cute, they don't take account of prevailing winds and storm conditions. And, the documents whitewash effects of increasing production, making scant mention of climate change.

Cruise shipping and the tourist industry, already affected by bushfires, won't take kindly to increased shipping and log-loading, air and possibly water pollution.

Most of all, Councillors, the recent bushfire ravages of more than 80% of our native timber resources can't be under-estimated. The bush can't take any more full-on attacks. Victoria is phasing out native timber logging within the decade.

Why don't you lead the way here? Say no to the proposed expansion of the woodchip mill.

I note that the EPA has til 2nd June to lodge their assessment.

I hope the proposal is soundly rejected.

Sincerely,

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Eden chip mill  
**Date:** Tuesday, 5 May 2020 9:46:59 AM

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Dear Sir/ Madam,

I have been a rate payer of the Bega Valley Shire since 1988. In that time I have witnessed many incidents of destructive logging practice primarily driven by the demand for wood chips from the Eden Chip Mill.

I believe that the mill should be closed permanently. I oppose any further development of the site as a timber processing plant.

[REDACTED]  
[REDACTED]  
[REDACTED] 2546.

Sent from my iPad

[REDACTED]  
MORUYA NSW 2537  
[REDACTED]

Ms Alice Howe  
The Director  
Community, Environment and Planning  
Bega Shire Council  
Administration Centre  
Zingel Place  
BEGA NSW 2550

Dear Ms Howe,

**Submission re DA 10-2020-81-1 of Allied Natural Wood Exports P/L for “Timber optimisation hub”**

Thank you for the opportunity to comment on this DA.

### **Background**

In 1967 the Eden Woodchip Mill commenced processing native forests throughout South Eastern Australia into chips and other products. It was promoted and implemented by the Askin State Government with limited environmental assessment. The scale and scope of the Mill's operations has significantly increased in this time and ownership has changed several times.

Each stage of the Mill's expansion has seen escalating contention between community representatives (including Councilors), various authorities, the State Government over economic and environmental issues. The devastation of the 2020 bushfires throughout South East Australia combined with the onset of major climate change has already prompted many major Government reviews at Federal and State levels. All Local Government authorities affected are also reconsidering and amending their planning and development policies and practices to deal with the new context.

In the above DA, Allied Natural Wood Exports advise that their environmental assessment was made before the recent major bushfires (page 1, Statement of Environmental Effects). They further advise that they have updated it in relation the immediate visual and local environmental site effects of the development. There was clearly no opportunity for them to review and consider the wider impacts of the 2020 summer's bushfires on the forests (80% destroyed) regarding the economic or environmental sustainability of their business and effect on communities involved.

### **Issues**

These are as follows:

#### 1. Scope.

The DA seeks to limit Council's consideration to the immediate area of the proposed development. The environmental impact of the major equipment to be installed (ie, the sawmill, pallet plant and briquette plant) however, extends through and beyond Bega Valley Shire into South East New South Wales and Victoria. As you are aware, these are all areas whose forests have been devastated by last summer's bushfires and whose further use needs full review to establish what is sustainable development in the new environment created by the fires.

Given the original economic and environmental basis of the mill and other equipment has largely been destroyed by the fires, the attempt by the applicant to limit the scope of consideration by Council is not in the long term interest of Council or the local and wider communities involved.

2. Bushfire impacts have been ignored/euphemised

Since 80% of the forests supplying the mill have been destroyed by the fires and the remaining forests and their wildlife are in a very precarious condition, Council cannot responsibly accept the applicant's ignoring of this issue. Incorporation of information from Government and scientific reviews of the bushfire's impacts is clearly required before informed decisions can be made.

3. Climate Change impacts are being ignored

Council and other authorities have accepted that accelerating climate change is changing the basis for environmental management and requires proactive planning policies and practices. Developments with major impacts and dependencies on communities and environments as in this DA clearly require Council to consider and incorporate where appropriate the latest science based projections on the effect of the climate change on our region.

4. Flexible, diverse and sustained use of our region's forests

Our forests are critical to the long term viability of our water supply, tourism, building, recreational and community amenity. Extending the monopoly of the applicant on the forests of our region through accepting the present DA - when the previous relevant environmental assessments are largely outdated (due to the fires etc) is surely not in the best interests of Council, the wider community or future businesses which may wish to access and use the forests. Deferment of the application to allow Council's Planning Department to review, consult more widely on the future use of the remaining forests so they may be able to give Council more informed options would seem to be appropriate.

**Conclusion**

The recent bushfires and other major climate change impacts has demonstrated this DA is grossly inadequate in scope and issues considered – and particularly needs to be considered in a wider context. It is therefore submitted that:


1. Council reject this DA and request that the applicant review the wider environmental context; and,
2. if it wishes to reapply, particularly incorporate the findings from the various Government reviews and scientific reports into the recent fires into sustainable use of the forests.

These steps will also provide time for Council Planning officers to also consider the findings from the various recent Government reviews and relevant scientific reports in their updating of strategic documents and guidance. Such a process will enable Council to make an informed consideration on the affected communities and their environments.

Yours sincerely,



13 May 2020

  
Moruya

General Manager  
Bega Valley Shire Council

[council@begavalley.nsw.gov.au](mailto:council@begavalley.nsw.gov.au)

Dear Sir/Madam

**Development Application (10-2020-81-1) – Timber Optimisation Hub – Objection**

I am writing to express my objection to the propped Timber Optimisation Hub. The grant of consent to this application would be contrary to the public interest and the requirements of the *Environmental Planning and Assessment Act 1979 (EPAA)*. In particular:

- a) Council does not have sufficient information before it to lawfully assess the application;
- b) The application is for “designated development” and requires an EIS;
- c) The proposal is contrary to a Council development standard and no clause 4.6 variation has been lodged; and
- d) The proposal is contrary to the public interest.

**1. Inadequacy of information**

The Statement of Environmental Effects (**SEE**) does not provide sufficient information to allow Council properly assess the proposal in accordance with the requirements of the EPAA. Specifically, for example:

- The newly constructed cruise ship terminal and associated operations is not considered in the SEE. View impacts from the terminal and cruise ships (with the associated increased public and tourist visibility of the region) have not been considered. The implications for the nascent cruise ship industry of continuing wood processing operations at the site for a further 15 years has not been assessed, despite the specific requirement for development in the IN1 zone “To minimise any adverse effect of industry on other land uses”.
- The character of the **area** has not been properly considered, instead only the degraded character of the site has been assessed. The site is on a prominent headland and is surrounded by the Ben Boyd National Park, the East Boyd State Forest and adjoins Twofold Bay. The heritage listed Edrom Lodge is the closest unrelated building to the site. The character of the area favours environmental and heritage conservation and the aesthetics values associated with that. The proposal

involves the construction of over 6,000sqm of 3-4 storey (approx. 12m high) buildings and the operation of significant plant and equipment. The proposal neither aligns with the character of the area nor is compatible with existing surrounding land uses. The surrounding coastal and built environment, and the bulk, scale and size of the proposed development is required to be considered under the Coastal SEPP.

- The visual impact of the site when operating has not been considered, for example the Briquette Plant will *“have visually identifiable plume as the plant will burn sawmill and woodchip residues”*. The visual impact of this plume has not been assessed, especially in the context of the highly sensitive tourist receivers Eden is seeking to attract.
- The noise assessment:
  - Has used at least 8yr old data to establish noise trigger requirements;
  - Does not identify background noise levels at Edrom Lodge (the closest sensitive receiver);
  - Does not identify the proposed hours of operation, consider the noise impacts of vehicle movements, identify the potentially intrusive character of for example the hydraulic nailer in the pallet line or identify the cumulative noise emissions from the site;
  - Does not identify how the nominated sound power levels of the various proposed operations has been calculated.
- Cumulative noise impacts are not considered. Cumulative air impacts (eg dust from the existing woodchipping operations) are also not identified. Cumulative impacts are required to be considered by Council.
- The scope 1 and 2 greenhouse gas emissions of the operations are not identified. The CO<sub>2</sub> emissions of the proposed “burning of sawmill and woodchip residues” in the proposed briquette plant has not been considered. The additional and presumably extensive electricity demands of the proposed new (log sorting, sawmill, pallet mill and briquette processing) operations has not been quantified. Consideration of these factors is required by Council’s obligations to have regard to the principles of ecologically sustainable development and consider whether the proposal is in the public interest under s4.15 of the EPAA.
- The proposal will increase the site’s water demands. An assumption is made that onsite rainwater collection and storage will cover the site’s water needs: *“On average, collected runoff from the site should be sufficient to supply water demands, including the new sawmill demand”*. However, this assessment fails to consider the implications of likely extended drought conditions on the assumed rainwater collection. Additionally, the separate water storage requirements for firefighting have not been identified. Details of the water access licences have not been

provided and it is unclear whether extraction will be permitted under the nominated WALs during drought.

- The traffic impact assessment is unclear. For instance, the SEE provides the following inconsistent information regarding traffic movements to and from the site:
  - Table 4.1 identifies the 2019 annual heavy vehicle movements associated with the woodchip mill as 21, 270 “incoming” and 425 “outgoing”.
  - “During the operational phase, the proposal would generate an additional 20 light vehicles and 4.2 heavy vehicles daily”. Assuming, for example a 310 day working year this would add 7,502 vehicle movements to and presumably also from the site – say an additional 15,000 vehicle movements per annum (2,604 of which are heavy vehicles) .
  - Table 4.5 then provides an estimate of the future annual heavy vehicle movements, identifying when the site is operational there are likely to be 20,794 incoming movements and 1337 outgoing movements.

Given that the proposed operations will generate new products (i.e. milled timber, pallets and briquettes), one would assume that there will significantly more vehicles capable of transporting finished product entering and leaving the site.

## 2. The proposal is for designated development

Council is required to consider whether the proposal is designated development. The SEE identifies that the project is prima facie designated development in that it falls within Item 33 in Part 1 of Schedule 3 of the EPA Regulations, being “Wood or timber milling or processing works”. The SEE asserts that it is not designated development on the grounds that the proposal falls with clause 35 of part 2 of schedule 3 of the Regulation which provides (emphasis added):

*Development involving alterations or additions to development (whether existing or approved) is not designated development if, in the opinion of the consent authority, the alterations or additions do not significantly increase the environmental impacts of the total development (that is the development together with the additions or alterations) compared with the existing or approved development.”*

This involves a determination of whether the proposal involves “alterations or additions” and an assessment by Council of whether or not it significantly increases the environmental impacts of the total development compared with the existing.

Relevantly, the proposal involves the construction of **multiple new buildings** adding at least 6,000 sqm of approximately 12m high buildings to the site. See figure 1.1 of the proposed development layout (from the Water Cycle Assessment/Water Management Report) extracted below.



The proposal is not an application for mere “alterations or additions”.



Clause 36 identifies a number of factors that must be considered by Council in determining whether the “alterations or additions” will significantly increase the environmental impacts. Irrespective of the issue of whether or not the proposal constitutes “alterations or additions”, Council does not have sufficient information to make the necessary assessment regarding environmental impacts. Relevantly:

- There is no cumulative air, noise or GHG/electricity assessment;
- The proposed briquette plant adds a significantly different set of environmental impacts to the site – being air emissions associated with the burning process and the saw mill and pallet mill operations are also an entirely new category of operations each of a sufficient scale to be classed as designated development (in their own right);
- Council has not been provided with details of the existing approved development and its modifications beyond a list of headings and accordingly is in no position to consider (as required): “*the number and nature of all past changes and their cumulative effects*”. For example, no historical data is provided on processing volumes at the site (or the volume limitations under the existing consent); and

- The SEE does not identify the occasions on which the holder of licences 20053 or 1482 was required to enter into pollution reduction programs regarding Bark management during vehicle loading operations, storm water management and general water management controls due to unsatisfactory environmental performance. It does not identify the EPA notices and waste and water pollution reduction programs required to be entered into to address waste and water management issues.

The proposal is prima facie for “designated development” and the proposal is not exempted by clause 35 of the Regulation.

### **3. Non compliance with the Bega LEP**

The proposal is contrary to a development standard and Council cannot consider the application without a clause 4.6 statement.

The LEP imposes a maximum height standard of 14m for the site. The smoke stack for the briquette plant will be at least 16.41m high.

Clause 4.3(1) of the LEP states the objectives of the maximum building height development standard are —

*“(a) to retain the existing character and landscape of the locality and to encourage a low-set building form,*

*(b) to protect residential amenity, views, privacy and solar access”*

Under the LEP building height (or height of building) is defined to mean the height of the building in metres *“including plant and lift overruns, but excluding communication devices, antennae, satellite dishes, masts, flagpoles, chimneys, flues and the like.”*

A ventilation stack for an industrial process (which requires regulation by the EPA) is of a different class and character to an antenna, flagpole or chimney. The briquette plant will process 4,000-8,000 cubic metres of product per years producing 20-25 tonnes of finished product per day. The plant will vent emissions from the burning of sawmill and woodchip residues via an industrial smoke stack. These emissions will create a visible plume. The smoke stack is more in the nature of “plant” than a minor largely inconspicuous ancillary roof element (of the character identified in the building height definition). Its presence will actually define the industrial character of the building. The smoke stack and its emissions will not be consistent with the character and landscape of the locality and must be specifically assessed and justified.

#### 4. Proposal not in the public interest

The proposal is not in the public interest.

The proposal is for the processing of hardwood timbers which is not environmentally sustainable and it is unclear whether given the recent bushfires there is a sufficient forest resource to make the industry viable.

The implications of the logging to feed the proposal on biodiversity and habitat extensively damaged by bushfires is potentially catastrophic.

The likely GHG emissions of and associated with the project have been ignored and the serious consequences for both the proposed operations (in terms of site water availability) and timber resource availability of further prolonged drought has not been considered.

The social/economic consequences of the proposal have only been superficially assessed. It is understood that the operation of the sawmill will actually displace over 30 workers as the proposed sawmill will substitute for (and replace) an existing mill.

The proposal is not capable of lawful approval under the EPAA and is contrary to the public interest.

Yours faithfully



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Eden Chip Mill timber optimisation hub Development Application (10-2020-81-1) comment  
**Date:** Tuesday, 12 May 2020 6:06:46 PM

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Just look at the satellite weather map each night for 20 years and you can see the wasteful loss of vegetation. Just like ecosystems communities need sustained diversity and symbiosis to thrive. Hasn't COVID-19 taught us that. Carbon Transition industry models will offer alternatives to native forest hardwood for single use/disposable products such as briquettes and palettes and chips for paper. Continuing with the old ways while new models are established is harm enough but to expand the native logging business into a monopoly with broader reach, is like adopting white australia policy or bleedletting as a treatment for hemorrhaging.

COUNCIL has a chance at leadership here: to prevent this misnomer 'forestry products' business model being implemented; to be protecting whole communities of complex life including human life, from rapid deterioration or total destruction from felling, erosion and fire. And further, to flagship different business models for timber regeneration, better plantation management, engineered wood products where wood is irreplaceable due to its natural and increasingly rare qualities; for council to embrace its local strategic development plan for a future by making changes now.

We need to save what is left of our forests ... habitat, urgently and if Council can contribute to that despite IPA and Murdoch Press' best efforts to dispute human carbon emissions damage, our elected representatives will be acting in keeping with the science for a sustainable future, in keeping with its responsibility to residents of the Bega Valley to protect its communities (even though that may not be apparent to many -up to 30% at this point in time).

The DA is asserting that the chipmill should be allowed to develop an enterprise based on better use of the resources it has, however as it was never a financial industry and less if the actual scope 1, 2 and 3 emissions are calculated and costs were included in its model. The EIS focuses on impact on contemporary human society, not the environment until page 27, reflecting outmoded priorities of the legislation. Not classifying this activity as industry in LEP is eternally contradictory with all other contexts of our socio-economic indicators resource improvement, employment, as far as a lay person can know.

Considering this application in isolation from the effects of sourcing of the material proposed for optimising, is reckless and seriously disingenuous. Not least but for example, in regard to the number of threatened species within 10 km of the DA site.

I also suggest that the findings of the NSW royal commission into the bushfire should be considered before approving this DA as there is a lot of science around forestry's role in wildfire and its consequences that will be tendered there.

Once more I suggest this is an opportunity for Bega Valley Council to show its leadership in climate change mitigation by taking preliminary steps that place it well for future directions, and rejecting the ANWE's application.

Thankyou

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Cc:** [REDACTED]  
**Subject:** Timber Optimisation Hub, Development Application (10-2020-81-1) Allied Natural Wood Exports (ANWE)  
**Date:** Wednesday, 13 May 2020 1:01:36 PM

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Dear Sirs & Mr Andrew Constance

## **Submission to Bega Valley Shire Council by Allied Natural Wood Exports (ANWE)**

I have today been made aware of this submission and am most alarmed on so many fronts.

The recent bushfire decimation in this area has made us all aware of how fragile is our environment, both the bush itself, the native wildlife within and our future well-being.

- In the summer bushfires, 80 percent of the forests available for logging were burnt.
- An estimated one billion animals were killed.

It would appear, from this submission - especially the report "Biodiversity and EPBC Act Protected Matters Report" - that this DA ignores the impacts of the summer bushfires on forests intended to supply the mill. **The forests which were already over logged.**

The Bega Valley Shire has declared a climate emergency and has a Climate Resilience Strategy. This DA ignores those Climate issues.

- 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 this DA.
- **Jobs will be lost in local sawmilling.** In 2019 Blue Ridge Hardwoods, with 55 employees lost the Eden sawlog Wood Supply Agreement to the woodchip mill and is now in the process of closing. The mill will employ 20, according to the DA.
- This DA would allow the woodchipping industry to tighten its grip on the forests of the entire South Coast and East Gippsland. If passed, this will become one of the biggest native forest sawmills in Australia.
- In addition to this, it would continue to produce typically over 600,000 tonnes of woodchips a year.

If Allied Natural Wood Exports (ANWE) gets this project approved, it will receive contractual entitlement to every single tree cut down from State Forests in the region.

In fact, 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.

This proposal stops a transition to plantations for the wood chip 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.

Serious consideration needs to be taken on many issues regarding this submission. It's aims are a blatant disregard of everything we have learned over the past years and a presents a serious threat to our community and the country.

Thank you

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** DA for Chipmill must not happen  
**Date:** Friday, 8 May 2020 6:10:12 PM

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Dear Council,  
Please, in your wisdom, do not allow the continuing destruction of what is left of our unique native forests.  
They are far too precious to be destroyed even further.  
We can never bring them back.  
The DA for the Chipmill must not be granted.

Kindly

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Community submission - Allied Natural Wood Exports application  
**Date:** Sunday, 10 May 2020 1:46:55 PM

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To the Bega Valley Shire Council,

This submission is in relation to the approval for Allied Natural Wood Exports to build a new sawmill, pallet plant and briquette plant. We sincerely ask, for the good of the community and its human and nonhuman inhabitants, that you do not approve this application.

There are many reasons for this request. The proposed developments would perpetuate logging of native forest. This is an issue of existential import not only to the local wildlife but to the local inhabitants: as discussed in a recent article published in *Nature Ecology & Evolution*, 2020, logging increases the landscape's susceptibility to bushfires. Logging causes a rise in fuel loads, increases potential drying of wet forests and causes a decrease in forest height. This leaves 450 tonnes of combustible fuel per hectare close to the ground. In seasonally dry landscapes, as we've already seen earlier this year, this is a disaster waiting to happen.

As a result of these 2020 bushfires, our South Coast forests cannot support added pressure. Over 80% of South Coast forest were lost in the summer, and the remaining forest is habitat for some of the nation's most imperilled species. Now more than ever this needs to be seen as part of the equation, considering the recent bushfires killed over a billion animals nationally.

At a broader level, approving this proposal would fly in the face of the Bega Valley Shire's Climate Resilience Strategy. At this stage, it simply shouldn't need explaining that logging contributes to climate change. Deforestation releases stored carbon into the atmosphere as carbon dioxide – both logging, and the bushfires that it helps to create, will increase the amount of free carbon in the atmosphere. Declaring a climate emergency will be mere lip service if the Council approves this application, creating one of the biggest native forest mills in Australia.

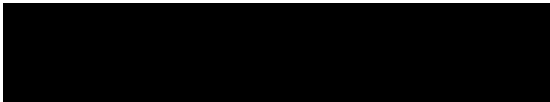
Logging also directly impacts soil and hydrological cycles, as the reduction in tree cover leads to increases in water runoff and soil erosion. The degradation of water systems is something which affects us all. Despite the environmental guidelines set in place, there are regular breaches: for example, the Forestry Corporation of NSW recently received a warning for breaching a number of environmental regulations in its operations at Tantawangalo, including failing to implement appropriate stream side buffers. The policing of such breaches are inadequate: formal warnings and fines don't regenerate banks.

This will have ramifications for the industry for many years to come. The approval will oversee the creation of a monopoly buyer for every log produced in the Eden region. Furthermore, the Wood Supply Agreement, which requires the approval of this DA, will lock us into the use of native forest wood for another 10 years, with 5 yearly extensions after that, significantly slowing down the transition to plantation logging. This is a regressive move for the industry.

The proposal may also have economic consequences. The development is at odds with the South Coast's regional identity, and how we wish to promote ourselves. Our economy is



highly dependent on tourism, and even beyond the impact on air quality, noise quality, and large vehicle transport, being home to one of the nation's largest sawmills of native forest is antithetical to our image of "magnificent wilderness" (a phrase used in a local tourism brochure). Often, community support for such ventures is founded on the wish to support local jobs. However, approving the DA will mean a reduction in jobs: 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. We hope you will take these considerations into account when making your decision. Thank you for your time,



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** STOP LOGGING  
**Date:** Tuesday, 12 May 2020 1:34:57 PM

---

Stop logging in our forests please!!!  
The bushfires have taken enough of our bush land and native animals homes so please STOP!!!!

**From:** [REDACTED]  
**To:** [council@begavslley.nsw.gov.au](mailto:council@begavslley.nsw.gov.au); [RecordsMailbox](#)  
**Subject:** Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Tuesday, 12 May 2020 5:15:05 PM

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Dear Councillors

I am writing to urge you to oppose the plan for the Eden chipmill to expand it's operations under the proposed DA, while continuing to woodchip our native forests.

Approval of this project would make the needed transition to plantation forestry harder and create incentives for intensifying native forest logging – despite the Victorian move to ban this industry and the strong public opinion against its continuation.

The DA does not accurately reflect the air quality, noise impacts, water resources and quality and motor vehicle traffic because it only considers the chipmill sites and ignores the rest of the supply chain necessary to keeping it running.

The devastating impact of the summer fires mean that we should be closing the chipmill, not expanding it. The impacts of native forest logging are significant and not sufficiently addressed in the application. During the devastating summer fires 80 percent of the forests available for logging in the South East were burnt and across the country an estimated one billion animals were killed. The forests must be allowed to recover. Now is not the time for expanded logging, but for a moratorium.

The proposal is inconsistent with climate change mitigation strategies and will see the release of significant carbon stores into the atmosphere.

Right now our forests are more valued and precious than ever - as habitat for animals, biodiversity reservoirs and places to relax and play.

Thank you

Yours sincerely

[REDACTED]

Sent from my iPhone

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** submission re DA 10-2020-81-1  
**Date:** Wednesday, 13 May 2020 12:52:34 PM

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Dear BVSC,

I wish to let you know that I do not support the DA to re-develop the Eden Chip Mill.

It's burnt and most of the forests around it got burnt.

We need to pause and reflect before diving into something that will commit the timber to this single purpose.

Conserving what forests we have left for environmental and economic reasons is paramount – the tourist industry and carbon sequestration need to be the top of our list of priorities at this time. Please undertake very considered research into these matters before committing us to more logging.

Thank you

[REDACTED]

[REDACTED]

[REDACTED]

Bega 2550

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Submission re Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Wednesday, 13 May 2020 11:34:41 AM  
**Attachments:** [Eden Woodchip Mill Submission.docx](#)

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## **Submission to Bega Valley Shire Council re Timber Optimisation Hub, Development Application (10-2020-81-1)**

As a resident of Eurobodalla which adjoins Bega Valley Shire, I am very concerned about the proposed expansion of the Eden Woodchip Mill foreshadowed in this DA.

The mill has already seen the demise of small, labour intensive sawmills in our shires and this proposal will see the mill owner, Allied Natural Wood Exports (ANWE), monopolise even further the timber industry in the SE. This will not be good for jobs in the timber industry. This DA specifies 20 people employed in sawmilling whereas 55 people were employed by Blue Ridge Hardwoods who lost the contract to supply saw logs to the Eden Woodchip Mill in 2019.

80 percent of our forests available for logging were burnt in the summer bushfires, little to no account has been taken of this in the DA. Our forests were already overlogged and these proposals may put an unreasonable stress on fragile ecosystems and be unable to supply enough resource to be viable. There should be a moratorium on logging until both plants and animals have recovered from the impacts of the summer bushfires.

The rapacious nature of these proposals do not in any way take into account the climate emergency we are facing. We need to be helping the reliance of our ecosystems in the face of escalating climate change not continuing profits at any cost for huge monopolistic companies. Our forests need to be drawing down carbon from the atmosphere for long term storage.

This DA is not just about approval for three sheds. It allows the woodchip industry to expand its control over the South Coast and East Gippsland forests. It will make the Eden mill one of the biggest native forest sawmills in Australia processing 60,000 m3p/a on top of over 600,000 tonnes of woodchips a year.

If ANWE obtains approval for this development it will get entitlement to every tree cut down from State Forests in the region. The new Wood Supply Agreement between the Forestry Corporation and ANWE commencing 1 January 2020 requires meeting certain milestones in relation to this development.

It would also stop the transition to plantations for the woodchipping industry and perpetuates intensive native forest logging which has so degraded the region's forests. 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.

For the sake of our forests and all the communities of South Eastern Australia I ask that you reject this development and ensure that our forests are not destroyed for the profits of the timber industry.

[REDACTED]

[REDACTED]

MORUYA 2537

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Objection to development application 10-2020-81-1  
**Date:** Wednesday, 13 May 2020 3:20:45 PM

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Please note my objection to the development application below

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

### **Submission to Bega Valley Shire Council**

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. 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 over logged.

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.

Jobs will be lost in local sawmilling. In 2019 Blue Ridge Hardwoods, with 55 employees lost the Eden sawlog Wood Supply Agreement to the woodchip mill and is now in the process of closing. The mill will employ 20, according to the DA.

This DA would allow 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.

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

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.

This proposal stops a transition to plantations for the wood chip 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.

**thanks**

[REDACTED]

[REDACTED] **Tuross head NSW**

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Objection to logging  
**Date:** Wednesday, 13 May 2020 10:41:13 AM

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I would like to lodge an objection to the logging of our forests, especially as most of the east coast forests have been severely burnt recently & is a long way from providing either habitat for the remaining animals or enjoyable recreation. It is an indictment of greed that Forestry would swoop on the remaining trees with such speed & insensitivity.

Yours sincerely,

[REDACTED]

Sent from [Mail](#) for Windows 10

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Timber Optimisation Hub, Development Application (10-2020-81-1) - objection  
**Date:** Thursday, 7 May 2020 7:52:51 PM  
**Attachments:** [DA chipmill submission.pdf](#)

---

Hello

Attached is my objection to Development Application (10-2020-81-1), Timber Optimisation Hub. I would be grateful if you would forward this to appropriate BVSC staff and to all Councillors.

Thank you.

regards

[REDACTED]



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

Submission from [REDACTED], Bega NSW 2550

## 1. Scope

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

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

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

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

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

[https://www.forestrycorporation.com.au/data/assets/pdf\\_file/0006/1214637/allied-natural-wood-exports-pty-ltd-hardwood-forests-sawlogs.PDF](https://www.forestrycorporation.com.au/data/assets/pdf_file/0006/1214637/allied-natural-wood-exports-pty-ltd-hardwood-forests-sawlogs.PDF)

## 3. Cost

There is conflicting information about the cost of the project. In a BVSC video<sup>1</sup> interview, promoting the project on 22 April 2020, the project was described as having a value of \$45 million. However, in the DA documents the development cost stated is \$14.5 million, with the cost of the colorbond buildings given as \$1,836,586.

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

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

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

The project seeking approval would provide the means for the woodchipping industry to tighten its grip on the forests of the entire South Coast and East Gippsland. The development will make this one of the biggest native forest sawmills in Australia, processing 60,000 m<sup>3</sup>/a. Ninety six percent of hardwood sawmills in Australia<sup>2</sup> are less than 45000 m<sup>3</sup>/a throughput.

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

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

<sup>2</sup> [ABARES 2019](#)

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

Submission from [REDACTED], Bega NSW 2550

### 5. Bushfire impacts have been ignored

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

In the summer bushfires, 80 percent of the forests available for logging were burnt. An estimated one billion animals were killed. The forests of the region were already overlogged and there are serious doubts about whether the forests can supply enough resource to make the industry viable. Establishing this facility will increase pressure on the forests at a time when they are in no position to recover.

Further, there is growing scientific evidence<sup>3</sup> that intensive industrial logging of native forests increases fire risk and makes fires harder to control. The Border Fire, which in January 2020 travelled from the Victorian border to Eden in a single day is a good example of this. It burnt through some of the most intensively logged forest in Australia having been subjected to decades of logging for the woodchipping industry.

### 6. Climate issues have been ignored

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

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

In 2019 Blue Ridge Hardwoods, with 55 employees lost the Eden sawlog Wood Supply Agreement to ANWE and is now in the process of closing. The new ANWE facility will employ 20, according to the DA. This project will thus be the direct cause of Eden sawmilling jobs falling by more than 50 percent.

### 8. Previous matters before Council

The Statement of Environmental Effect 2.2 lists previous Development Approvals granted under NSW Planning Legislation.

This list overlooks reference to the 2 metre tall, high voltage electrified fence that was built in 2002 to keep protesters out. The fence was retrospectively legitimised after complaints.

### 9. Conclusion

There are many compelling reasons to reject the DA. Bega Valley Shire Council will be acting in the longer term interests of residents, ratepayers, their economy and environment if it rejects it.

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

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Eden woodchip mill DA  
**Date:** Tuesday, 5 May 2020 3:27:57 PM

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regarding the proposed eden woodchip mill DA.  
Objection . opposed . NO to this proposal. Not in my name.

For 50 years despite sound science and much opposition the chipmill has continued to clear fell our south east forests , reducing their capacity to make water, maintain soil , maintain biodiversity , sustain habitat and renewal, making them and our region more fire prone. The 2020 summer showed clearly the trouble we are in due to poor management, horrendous hazard reduction and a deep failure to understand the science of climate weather human and the interconnection of all ecosystems.

This era of madness stops now. Refuse the DA.

The woodchip mill needs to be permanently closed down not Blue Rydge. The jobs are few and the cost to our environment is too high. For our grandchildren and quality of life , for all beings, for a clear sky and water in our streams , for air to breathe , for our unique forest and bushland , our unique creatures, for a holistic integrated planetary model this DA must be rejected and the eden mill given its close down orders.

[REDACTED]  
[REDACTED]  
Wandella NSW 2550  
[REDACTED]



13-May-20

Submission to Bega Valley Shire Council on DA No. 10-2020-81-1

## Eden Woodchip Hub *'Timber Optimisation'*

Where are our innovative **emergency 'Carbon Optimisation', 'Jobs Optimisation' & 'Wildlife Optimisation'** proposals? Opportunities die if this selfish development *clear-fells* native forest regions of Eden, South Coast and East Gippsland.

Fortunately, on **27-Apr-20**, *Natural Resources Commission* RFT 10031551 requested **'Carbon balance of NSW Forests: Quantify carbon balance of Forests and how it may change under different policy, management & climate scenarios'**.

**State Forest logging, burning & wood-chipping creates the largest annual carbon emissions from South East NSW.**

50 years ago liars told us *'just the heads & tails waste'* from saw-logs go into wood-chips. Trouble began as Ministers made *State Forests 'self-funding'*. As saw-logs ran low, *uncontrolled wood-chipping from whole-logs filled their wallets*. Today over 90% of whole-logs are trucked directly to the Eden Chip Mill, and 70% of forest carbon is lost to emissions. State Forests have never had a **'social licence'** to log primarily for wood-chips, let alone sell 20% of logs for Firewood!

We are developing a **'100-year State Forests Carbon Credit'** Proposal for our NSW Govt. based on a COP 26 'Rule Book'. **Wildlife** including Australia's *unique* gliders, parrots and Threatened Species need **100-year-old-tree hollows** to survive. **First**, (a) **stop logging emissions** & (b) deliver **'carbon capture & storage'** credits from our publicly owned State Forests. **Next**, pay LALCS & Farmers to grow **'Carbon Forestry' Plantations**. Both *could* deliver **credible 'Zero Emissions by 2050'**. **Jobs** (e.g. Youth & Aboriginal) in each Local Gov. Area are funded by Governments' 100-year State Forest Carbon Credit.

We support *Plantation Forests* already supplying 85% of timber & **300 jobs** in Southern NSW. **Plantation wood is good.**

**JOBS** are being displaced by massive logging machines in all State Forests, clearing one hectare per day per operator job. **Eden's new 'Automated' Pallet Plant\*, Sawmill & Briquette Production 'Hub' will cause more job losses**, starting in Eden and Narooma>(\*Boral say they only provided *'technical advice'* to this *'Timber Optimization Hub'* DA Applicant).

**JOBS in nature-based tourism already dominate. 'Timber towns' have evolved into 'tourist towns' on our South Coast.** After COVID-19, road visitors 'half-way' from Melbourne, Sydney & Canberra will start returning to **Eden** more than ever. Later on, yachts and cruise ships will inevitably rediscover Eden as the only deep-water port between Sydney and Hobart (welcoming 100 cruise ships in 2018). Tourism is booming in Tasmania with visitors attracted by World Heritage **natural areas**. Our **'Unspoilt'/Wilderness Coast** offers many *unique Australian National Park & Aboriginal Heritage experiences*.

**Sapphire Coast Tourism** (Bermagui to Victorian border) already **attracts \$350 million per year**, with Eden Killer Whale Museum (Heritage Tourism) and Kiah Wilderness Tours (Ecotourism) our top tourism award winners in 2018.

**Eurobodalla** (Narooma to Batemans Bay) Mayor Innes said in 10-Oct-18 "We want to be a leading nature-based tourism destination. We welcome 1.3 million visitors to our part of the world. **Tourism supports 90% of local jobs** (65% directly)".

Job-generating Aboriginal cultural heritage projects like the iconic Bundian Way are also adversely affected by this DA. **This 'Eden Timber Hub' is the wrong development in the wrong place.** This area is a prime tourism opportunity, better suited to something akin to a modern *'Eden Adventure Camping Ground'*; serving the nearby warf, highway, Boyd Tower, & *'Light-to-Light'* South Coast track, also linking Eden beaches to the epic east-west 350 km **'Alps2Coast' Bundian Way**.

**Capital** investment around the **Eden Warf** reflect the *potential* of this key iconic location and *surrounding natural region*. Could this DA's huge *Colourbond Steel Sheds 'drum'* amplified production-decibel **noises** clear across Twofold Bay? The **12 Metre Smoke Stack** must never contradict our visitors **views** from restaurants, lookouts and the decks of cruise ships. **Visual & noise pollution must never accompany a Twofold Bay 'Air Shed' of toxic gas fumes & increased forest smoke.**

**'Why risk killing the goose that laid the golden egg'** in Eden's surroundings of unique marine & natural forest assets?

Batemans Bay

**From:** [REDACTED]  
**To:** [RecordsMailbox; bega@parliament.nsw.gov.au](mailto:RecordsMailbox; bega@parliament.nsw.gov.au)  
**Subject:** TimberOptimisation Hub, DevelopmentApplication (10-2020-81-1)  
**Date:** Friday, 8 May 2020 1:08:51 PM

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## **Submission to Bega Valley Shire Council**

I am writing to protest against any expansion of Allied Natural Wood Exports' mill activities. The mill is already decimating huge areas of our forests and releasing large amounts of carbon into the atmosphere with its woodchipping. We need to be growing forests to deal with the climate chaos not destroying them. More than 80% of South Coast forests were burnt in the summer bushfires, the forests of our region simply cannot support this expansion.

### **1. 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.

### **2. 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.

### **3. 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 the woodchip mill and is now in the process of closing. The mill will employ 20, according to the DA.

### **4. 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 m<sup>3</sup>/a. Ninety six percent of hardwood sawmills in Australia are less than 45000 m<sup>3</sup>pa throughput. - [ABARES 2019](#))

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

### **5. 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](https://www.forestrycorporation.com.au/_data/assets/pdf_file/0006/1214637/allied-natural-wood-exports-pty-ltd-hardwood-forests-sawlogs.PDF)

### **6. 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.

### **7. 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.

Yours sincerely,

[REDACTED]

[REDACTED], Tuross Head NSW 2537

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Application: Development Application (10-2020-81-1)  
**Date:** Wednesday, 13 May 2020 3:11:15 PM

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Re: Timber Optimisation Hub

To Whom It May Concern.

I strongly disagree with the proceeding of this DA on the grounds of the undeniable fact that 80% of South Coast forests were destroyed in the recent bushfires, This DA aims to restrict impacts of environmental impacts.

It ignores the EPBC Act and the impacts of the fires on biodiversity and the surrounding environment. Logging of forests makes them more fire prone. These are facts stated by reputed scientists and ecologists.

The impacts of further logging after the fires and the fact that these forests were already over-logged is a fact that cannot be sustained.

This DA is proposed by a company that will have a monopoly on the clear felling of trees in the region. And all to support around 25 local jobs.

The footprint of the construction of this mill and the ongoing destruction of forests and wildlife habitat are a major consideration. It is time for transition to new ways.

We do not need to destroy our life-giving forests for copy paper or biomass. The carbon footprint of using forestry biomass and its polluting of the environment are now peer reviewed worldwide.

And what gives Allied Natural Wood Exports the right to destroy public forests to make profits from a public resource. These are public lands.

I again state that I am opposed to the approval of this DA.

Regards,

[REDACTED]

## Application: Development Application (10-2020-81-1)

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Email sent using Optus Webmail

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Objection to the Eden Woodchip Mill  
**Date:** Friday, 8 May 2020 1:05:45 PM

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**To whom it may concern,**

**I strongly object to the expansion of the mill's activities on the following grounds;**

**1. 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.

**2. 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.

**3. 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 the woodchip mill and is now in the process of closing. The mill will employ 20, according to the DA.

**4. 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 m3p/a. Ninety six percent of hardwood sawmills in Australia are less than 45000 m3pa throughput. - [ABARES 2019](#))

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

**5. 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](https://www.forestrycorporation.com.au/__data/assets/pdf_file/0006/1214637/allied-natural-wood-exports-pty-ltd-hardwood-forests-sawlogs.PDF)

**6. 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.

**7. 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.

Sincerely

[REDACTED]



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Eden chip mill  
**Date:** Thursday, 7 May 2020 10:30:09 AM

---

I am writing to strongly oppose the rebuild and extension of the Eden wood chip mill. It would be a total disaster to even consider a future in wood chips and the other proposed developments.

The forest needs to be managed and protected after such a devastating summer of bush fire.

The native wildlife needs immediate protection and careful management post fires.

The chip milling days are over, leave it at that.

The obvious (non environmental) losses in a future chip mill... as low as \$3.72 per tonne, excessive CO2 levels released, all the fuel used to truck and move chips, the state of government and lack of environmental concerns, toward a cleaner future. Our lack of concern for future generations for a quick (non existent) buck.

It's ridiculous.

Forest management used selectively for timber, building and fuel, while consciously thinning the bush carefully in certain areas, winter burns, local knowledge, working together as community.

Everyone owns the forests, knowledge needs to be shared to grow together.

Don't make the mistake of thinking this mill is in any way beneficial for anyone.

Regards

[REDACTED]  
Dignams Creek.

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** strongly against the Eden chipmill DA approval for an expanded mill  
**Date:** Wednesday, 13 May 2020 4:31:48 PM

---

to Bega Valley Council,

I have been a resident in the Bega Valley for more than 25 years - living mostly in Quaama and Cobargo region - I have seen what drought and fires have done to our natural environment.

Presently the forest shows the first signs of new growth - some birds and native animals are coming back. We lost billions after the fires.

The tragic impact of our fires in the Eden Region provide a case study in how logging increases bushfire risk.

**Please do realise that the lobby for maintaining -- and now expanding! the Eden chipmill might be strong but is only a comparative small percentage of our population who only benefit directly by pulling wages out of this industry. Please consult knowledgeable scientist who actually know what it takes for our devastated forest to recover.**

Do realise logging especially that of a burned forest causes erosion.

Think of the future of tourism.

Remember the many interviews, documentaries made from around the world being concerned of our native animals after the fires!! Personally I met a French tv crew and New York based papers. What do we tell them now - thank you for all your donations for native animal recovery and native habitat - but we live in an area who doesn't care??!!

[REDACTED]

Quaama, 2550

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Timber Optimisation Hub, Development Approval (10-2020-81-1)  
**Date:** Monday, 11 May 2020 3:17:45 AM

---

I wish to voice my objection to the Development Application (10-2020-81-1)  
This D.A. is not about building new buildings to replace those lost in the recent bushfires.  
It is about increasing capacity of the Allied Natural Wood Exports to mill saw logs.  
Approval of this D.A. will lock in the use of native forest wood for at least another decade  
with 5 yearly extensions after that.

The people o the Bega Valley want action on climate change and approval of this  
development would be to ignore the wishes of the constituency you represent.  
I call on all councillors to rationally consider all the ramifications of this D.A. and deny it  
on the grounds of the ecological damage it will do to our shire plus the economic damage  
that will flow on from that.

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Chip Mill DA  
**Date:** Tuesday, 5 May 2020 9:31:09 PM

---

To the General Manager,  
I know the Eden Chip Mill has a DA for building some infrastructure.  
This cannot be looked at in isolation but must be considered in the bigger picture of;  
Post fire recovery and our Climate Crisis.

80% of our forests were burnt out in the horrendous fires this summer 2020 and the science is telling us that logging now, of any kind is very very damaging to these fragile ecosystems.

Please call a Moritorium on all forestry while Australia takes a breather and considers how to properly manage our forests, plantations and bushland,

Thankyou

Yours sincerely

[REDACTED]

[REDACTED]

MOGILLA 2550

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Timber Optimisation Hub. DA 10-2020-81-1  
**Date:** Tuesday, 12 May 2020 6:22:48 PM

---

Dear Sir

I wish to comment on the chip mill proposal in this DA.

This development will have a HUGE impact on the hardwood forests of the South Coast and East Gippsland. It is much bigger than any other forest industry in Australia and creates a monopoly access and degradation of all South East forests.

It will also stop future plantation woodchipping and seriously impact climate, the environment and fauna throughout the supply zone. There is no consideration for these impacts! Further these forests were extensively devastated by fires last summer, which makes the remaining sections a significant wildlife refuge and seed bank for regeneration. We cannot afford to lose this resource to chipping.

Lastly, what about the impact on jobs in the sawmilling industry? This development will have an adverse effect on this industry and not afford the same employment opportunities.

[REDACTED]

Bermagui

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Tuesday, 5 May 2020 10:15:10 AM

---

Dear Council

I am extremely alarmed by this proposal and what it means for the future of native forests in and around the shire but also in the Eurobodalla. Surely if this year's dreadful fires show anything, it is that the habitual removal of the south coast's iconic forests has led to a drying environment, and the continual logging and its associated debris have wide reaching implications for South East New South Wales. If trees were to be cut down in small numbers for housing or other long term benefits perhaps people would understand. But to remove native forest for wood chips, briquettes, fire wood and fibre is beyond criminal. Surely those wishing to profit from these industries can simply grow their own trees and wait to harvest them, not remove what little remains of the large tracts of native forest desperately trying to recover from the dreadful fires, and remain standing despite the greed of the logging industry.

Approval of this facility, which reduces local employment because of its high tech machines and other changes in operations, is tantamount to Bega Valley Shire Council condoning the extinction of critically endangered species.

I urge you to act within the standards expected of the community - which requires governance and accountability - particularly in respect of how rapidly government decisions influence climate change.

Approval of this facility must be weighed up against the factors hanging in the balance here - what steps are being made to offset the damage being done by the trees proposed to be processed?

Will it be 10 years, or will it only be 5 years, before courts come looking for the parties responsible for aiding and speeding climate change? What will Council's argument then be, that it did not know? I think not.

Many Councils are beginning to take a stance on these issues, and it is they who set to gain in this rapidly changing world.

The future is not in killing trees, it is in restoration and tourism. Even the present provides more jobs there, than the government sponsored logging industry.

I look forward to your response.

[REDACTED]

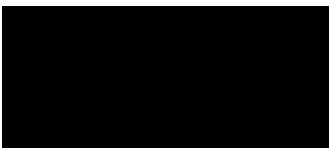
**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Cc:** [REDACTED]  
**Subject:** Timber Optimisation Hub, Development Application (10-2020-81-1)Submission to Bega Valley Shire Council  
**Date:** Thursday, 14 May 2020 12:23:26 PM

---

Please find our submission to oppose the **Timber Optimisation Hub, Development Application (10-2020-81-1)**.

We oppose the development application on a number grounds.

1. Numerous medicinal products are found within forest ecosystems. These are often unique life saving medicinal properties. We must save our forests to save our lives.
2. In the 2019/20 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 over logged before the bushfires. The report "Biodiversity and EPBC Act Protected Matters Report" ignores the impacts of the summer bushfires on forests intended to supply the mill
3. 35 direct jobs will be lost for residents of the Bega Valley Shire with the closure of Blue Ridge Hardwoods when the wood supply agreement is handed to the woodchip mill. This will have negative effects on the local economy.
4. This proposal will stop any transition to the establishment and use of plantation timber by the woodchipping industry, and perpetuate the degradation of the remaining native forest.
5. Approval of this proposal would make a mockery of Bega Valley Shire's declaration of a climate emergency - completely ignoring the contribution this project would make to accelerating climate change.



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Community submission - Allied Natural Wood Exports application  
**Date:** Sunday, 10 May 2020 1:46:55 PM

---

To the Bega Valley Shire Council,

This submission is in relation to the approval for Allied Natural Wood Exports to build a new sawmill, pallet plant and briquette plant. We sincerely ask, for the good of the community and its human and nonhuman inhabitants, that you do not approve this application.

There are many reasons for this request. The proposed developments would perpetuate logging of native forest. This is an issue of existential import not only to the local wildlife but to the local inhabitants: as discussed in a recent article published in *Nature Ecology & Evolution*, 2020, logging increases the landscape's susceptibility to bushfires. Logging causes a rise in fuel loads, increases potential drying of wet forests and causes a decrease in forest height. This leaves 450 tonnes of combustible fuel per hectare close to the ground. In seasonally dry landscapes, as we've already seen earlier this year, this is a disaster waiting to happen.

As a result of these 2020 bushfires, our South Coast forests cannot support added pressure. Over 80% of South Coast forest were lost in the summer, and the remaining forest is habitat for some of the nation's most imperilled species. Now more than ever this needs to be seen as part of the equation, considering the recent bushfires killed over a billion animals nationally.

At a broader level, approving this proposal would fly in the face of the Bega Valley Shire's Climate Resilience Strategy. At this stage, it simply shouldn't need explaining that logging contributes to climate change. Deforestation releases stored carbon into the atmosphere as carbon dioxide – both logging, and the bushfires that it helps to create, will increase the amount of free carbon in the atmosphere. Declaring a climate emergency will be mere lip service if the Council approves this application, creating one of the biggest native forest mills in Australia.

Logging also directly impacts soil and hydrological cycles, as the reduction in tree cover leads to increases in water runoff and soil erosion. The degradation of water systems is something which affects us all. Despite the environmental guidelines set in place, there are regular breaches: for example, the Forestry Corporation of NSW recently received a warning for breaching a number of environmental regulations in its operations at Tantawangalo, including failing to implement appropriate stream side buffers. The policing of such breaches are inadequate: formal warnings and fines don't regenerate banks.

This will have ramifications for the industry for many years to come. The approval will oversee the creation of a monopoly buyer for every log produced in the Eden region. Furthermore, the Wood Supply Agreement, which requires the approval of this DA, will lock us into the use of native forest wood for another 10 years, with 5 yearly extensions after that, significantly slowing down the transition to plantation logging. This is a regressive move for the industry.

The proposal may also have economic consequences. The development is at odds with the South Coast's regional identity, and how we wish to promote ourselves. Our economy is



highly dependent on tourism, and even beyond the impact on air quality, noise quality, and large vehicle transport, being home to one of the nation's largest sawmills of native forest is antithetical to our image of "magnificent wilderness" (a phrase used in a local tourism brochure). Often, community support for such ventures is founded on the wish to support local jobs. However, approving the DA will mean a reduction in jobs: 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.

We hope you will take these considerations into account when making your decision.  
Thank you for your time,



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Submission for sawmill development  
**Date:** Sunday, 10 May 2020 1:41:26 PM  
**Attachments:** [Submission-sawmill-development.docx](#)

---

Hello

I have attached a submission in relation to Allied Natural Wood Exports' plans to build a new sawmill.

Thanks.

[REDACTED]

To the Bega Valley Shire Council

I am making this submission in response to Allied Natural Wood Exports plans to build a new sawmill and pallet plant. There are numerous reasons that the development approval should be denied.

The chief one is the negative environmental impacts of native forest logging. It destroys wildlife habitat, releases stored carbon into the atmosphere, and leads to increased erosion and soil entering waterways. South Coast forests are already in a very fragile condition after the 2020 bushfires, they need time to recover and regrow. Logging places extra pressure on these already damaged eco-systems that will slow down or reverse their recovery.

There is also an economic argument to be made that logging is not making the best use of an important regional asset. Healthy wilderness areas and abundant wildlife are a vital component of the Far South Coast tourism industry. These attractions are a significant factor in peoples' decisions to visit and holiday along the South Coast. Extensive native forest logging conflicts with the way the council promotes the local area and is detrimental to the growth of the tourist sector.

Thanks,

A black rectangular redaction box covering the signature of the sender.

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Logging  
**Date:** Wednesday, 13 May 2020 7:23:30 PM

---

Dear sir/madam.

Due to unprecedented and devastating fires it would be wise and prudent to decline the expansion of Eden Chipmill.

Get [Outlook for Android](#)

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Development Application (10-2020-81-1)  
**Date:** Tuesday, 12 May 2020 8:16:54 PM

---

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

Please leave the bush alone!

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Cc:** [REDACTED]  
**Subject:** Submission to oppose the application for Allied Natural Wood Exports (ANWE)  
**Date:** Sunday, 10 May 2020 7:26:21 PM

---

Dear sirs and madams of the Council in Bega,

I heard with a heavy heart about the application from Allied Natural Wood Export, to not just getting support from the council to rebuild the bush fire affected wood mill, but in fact, to approve an extension!!

I am opposing to this application for the following reasons:

1. We had horrible bush fires this season, which destroyed 80% of our native forest! You can not ignore the importance of the native forest there is left! We need it for our wild life, who desperately needs that space and we need it for our climate! Every tree we are destroying from a native forest is a step closer to get bigger climate disasters every season. Was that bush fire from this season not enough for the shire?
2. If you approve for Allied Natural Wood Export to log in the native forest, there will no effort be made, to plant a plantation, as it will always be taken the most easiest way.
3. Australia is first in the world with logging. Our country has a bigger logging destruction rate than any other place in the worl. Do you agree, that this is a very shameful first place????!!!!
4. An expansion of the mill does not create more jobs! It does not justify the destruction of the forest.
5. This project is not for the common good for the citizens and people of Bega Valley Council! It is for one greedy individual.
6. Does Bega Valley Council want to tell the fire fighters, who fought endlessly the devastating fires this season, that their effort was to extend a saw mill????!!!!
7. Climate change is real----we people are worried and need to see action from our council!!!!

Please accept my submission for opposing to that application!

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Objection to the Eden Woodchip Mill  
**Date:** Friday, 8 May 2020 1:05:45 PM

---

**To whom it may concern,**

**I strongly object to the expansion of the mill's activities on the following grounds;**

**1. 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.

**2. 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.

**3. 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 the woodchip mill and is now in the process of closing. The mill will employ 20, according to the DA.

**4. 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 m<sup>3</sup>/a. Ninety six percent of hardwood sawmills in Australia are less than 45000 m<sup>3</sup>/a throughput. - [ABARES 2019](#))

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

**5. 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](https://www.forestrycorporation.com.au/__data/assets/pdf_file/0006/1214637/allied-natural-wood-exports-pty-ltd-hardwood-forests-sawlogs.PDF)

**6. 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.

**7. 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.

Sincerely

[REDACTED]

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** FINAL One-page [REDACTED] t 13-May-20 "Eden Woodchip Hub" Bega Valley DA submission  
**Date:** Wednesday, 13 May 2020 10:36:22 PM  
**Attachments:** [REDACTED] [13-May-20 "Eden Woodchip Hub" Bega Valley DA submission.pdf](#)

---

Please replace my earlier half-page submission draft sent in error around 4.30pm.

*Cheers*

[REDACTED]

[REDACTED]

*Batemans Bay @* [REDACTED]

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**From:** [REDACTED] u  
**Sent:** Wednesday, 13 May 2020 4:44 PM  
**To:** council@begavalley.nsw.gov.au  
**Subject:** Attached: NatureNet 13-May-20 'Eden Woodchip Hub' Bega Valley DA submission  
Full page version available later.

*Cheers*

[REDACTED]

[REDACTED]

*Batemans Bay* [REDACTED]





13-May-20

Submission to Bega Valley Shire Council on DA No. 10-2020-81-1

## Eden Woodchip Hub *'Timber Optimisation'*

Where are our innovative **emergency 'Carbon Optimisation', 'Jobs Optimisation' & 'Wildlife Optimisation'** proposals? Opportunities die if this selfish development *clear-fells* native forest regions of Eden, South Coast and East Gippsland.

Fortunately, on **27-Apr-20**, *Natural Resources Commission* RFT 10031551 requested **'Carbon balance of NSW Forests: Quantify carbon balance of Forests and how it may change under different policy, management & climate scenarios'**.

**State Forest logging, burning & wood-chipping creates the largest annual carbon emissions from South East NSW.**

50 years ago liars told us *'just the heads & tails waste'* from saw-logs go into wood-chips. Trouble began as Ministers made State Forests *'self-funding'*. As saw-logs ran low, *uncontrolled wood-chipping from whole-logs filled their wallets*. Today over 90% of whole-logs are trucked directly to the Eden Chip Mill, and 70% of forest carbon is lost to emissions. State Forests have never had a **'social licence'** to log primarily for wood-chips, let alone sell 20% of logs for Firewood!

We are developing a **'100-year State Forests Carbon Credit'** Proposal for our NSW Govt. based on a COP 26 **'Rule Book'**. **Wildlife** including Australia's *unique* gliders, parrots and Threatened Species need **100-year-old-tree hollows** to survive. **First**, (a) **stop logging emissions** & (b) deliver **'carbon capture & storage'** credits from our publicly owned State Forests. **Next**, pay LALCS & Farmers to grow **'Carbon Forestry' Plantations**. Both *could* deliver **credible 'Zero Emissions by 2050'**. **Jobs** (e.g. Youth & Aboriginal) in each Local Gov. Area are funded by Governments' 100-year State Forest Carbon Credit.

We support *Plantation Forests* already supplying 85% of timber & **300 jobs** in Southern NSW. **Plantation wood is good.**

**JOBS** are being displaced by massive logging machines in all State Forests, clearing one hectare per day per operator job. **Eden's new 'Automated' Pallet Plant\*, Sawmill & Briquette Production 'Hub' will cause more job losses**, starting in Eden and Narooma(\*Boral say they only provided *'technical advice'* to this *'Timber Optimization Hub'* DA Applicant).

**JOBS in nature-based tourism already dominate. 'Timber towns' have evolved into 'tourist towns' on our South Coast.** After COVID-19, road visitors *'half-way'* from Melbourne, Sydney & Canberra will start returning to **Eden** more than ever. Later on, yachts and cruise ships will inevitably rediscover Eden as the only deep-water port between Sydney and Hobart (welcoming 100 cruise ships in 2018). Tourism is booming in Tasmania with visitors attracted by World Heritage **natural areas**. Our **'Unspoilt'/Wilderness Coast** offers many *unique Australian National Park & Aboriginal Heritage experiences*.

**Sapphire Coast Tourism** (Bermagui to Victorian border) already **attracts \$350 million per year**, with Eden Killer Whale Museum (Heritage Tourism) and Kiah Wilderness Tours (Ecotourism) our top tourism award winners in 2018.

**Eurobodalla** (Narooma to Batemans Bay) Mayor Innes said in 10-Oct-18 "We want to be a leading nature-based tourism destination. We welcome 1.3 million visitors to our part of the world. **Tourism supports 90% of local jobs** (65% directly)".

Job-generating Aboriginal cultural heritage projects like the iconic Bundian Way are also adversely affected by this DA. **This 'Eden Timber Hub' is the wrong development in the wrong place.** This area is a prime tourism opportunity, better suited to something akin to a modern *'Eden Adventure Camping Ground'*; serving the nearby warf, highway, Boyd Tower, & *'Light-to-Light'* South Coast track, also linking Eden beaches to the epic east-west 350 km **'Alps2Coast' Bundian Way**.

**Capital** investment around the **Eden Warf** reflect the *potential* of this key iconic location and *surrounding natural region*. Could this DA's huge *Colourbond Steel Sheds 'drum'* amplified production-decibel **noises** clear across Twofold Bay? The **12 Metre Smoke Stack** must never contradict our visitors **views** from restaurants, lookouts and the decks of cruise ships. **Visual & noise pollution must never accompany a Twofold Bay 'Air Shed' of toxic gas fumes & increased forest smoke.**

**'Why risk killing the goose that laid the golden egg'** in Eden's surroundings of unique marine & natural forest assets?

Batemans Bay

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Cc:** [REDACTED]  
**Subject:** National Trust Submission regarding DA (10-2020-81-1)  
**Date:** Tuesday, 12 May 2020 11:57:37 AM  
**Attachments:** [image003.jpg](#)  
[NT Submission on Chipmill DA .docx](#)

---

Could you please distribute this submission to the relevant planning officer, Cecily Hancock, and Councillors Seckold, Tapscott, McBain, Dodds and Griff.

Many thanks

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Submission to DA 202081  
**Date:** Friday, 22 May 2020 9:03:24 AM

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## **Submission re DA for Edron Rd Chip Mill Development Hub DA 202081 Colin Sagar**

### **The General Manager BVSC**

Please accept this objection to this DA proposal Number 202081

My objection is on the grounds that the proposal will lead to the inevitable prolongation of intense logging / wood-chipping activity in the region and the long term infringement of provisions in the following acts:

**State Environment Policy** the proposal has 'Regional Significance' and should be referred to the Regional Development Committee.

**Biodiversity Conservation Act** The continuation for another 15 years at least, of the controversial intensive wood-chipping of native forests across the region, underpins this industrial DA. The consequences of this are profound for the fauna and flora of the region and should be of concern and receive active management at every level of government and the community at large.

**Protection of the Environment and Operations Act** The extension of wood-chipping for years to come under the guise of a 'shed construction' will have consequences and implications for the regions soil, water, vegetation and fauna and needs to be addressed under the Act.

Further, the DA has been lodged in 2020 and yet makes no reference to the direct or indirect effects on the DA of the early and extensive **2020 bush fires**. These fires will inevitably effect available raw material supplies to the factory expansion and have / will also effect the impacts of the proposal if accepted, on a range of environment and biodiversity concerns and legal provisions.

Further, the DA proposal makes no reference to impacts arising, on exacerbation nor mitigation of **Climate Change**....Clearly the institution of this major and long lived industrial complex has major consequences on the management of our forests and thus implications for climate change that need to be addressed and evaluated.

Please evaluate these concerns in determining this DA and refer where applicable to the relevant government agencies responsible for biodiversity, environment and climate. Further, please ensure this proposal has a thorough public consultation process.

Yours in Appreciation

[REDACTED]

[REDACTED]

Bermagui

NSW 2546

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Cc:** [REDACTED]  
**Subject:** Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Wednesday, 20 May 2020 8:13:50 PM

---

Dear Bega Valley Council

I concur with the fears of the South East Region Conservation Alliance below.

I know I've missed the deadline and I live in Moruya, but come on! I debate some very right wing blokes up here and we disagree on pretty much everything. But, ALL of them don't want our bush massacred for woodchips that are sent abroad.

[REDACTED]  
[REDACTED]  
Batemans Bay 2536  
[REDACTED]

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

### **Submission to Bega Valley Shire Council**

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. 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 over logged.

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.


Jobs will be lost in local sawmilling. In 2019 Blue Ridge Hardwoods, with 55 employees lost the Eden sawlog Wood Supply Agreement to the woodchip mill and is now in the process of closing. The mill will employ 20, according to the DA.

This DA would allow 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.

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

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.

This proposal stops a transition to plantations for the wood chip 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.

**From:**   
**To:** [RecordsMailbox](#)  
**Subject:** Protect our environment  
**Date:** Tuesday, 12 May 2020 2:26:35 PM

---

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

### **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 m<sup>3</sup>p/a. Ninety six percent of hardwood sawmills in Australia are less than 45000 m<sup>3</sup>pa 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](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.

**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Cc:** [REDACTED]  
**Subject:** Re: Timber Optimisation Hub, Development Application (10-2020-81-1)  
**Date:** Tuesday, 12 May 2020 10:09:39 PM

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**Dear Bega Valley Shire Councillors and Mr Constance,**

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

**I write this in regard to the proposed DA for the Eden Woodchip Mill's Timber Optimisation Hub.**

**After the 'Black Summer' that we have just had - in which 80% of the forests that were intended to supply this mill were burnt - and in which an (under)estimate of a billion animals are thought to have been killed - it is flabbergasting to think that the woodchipping industry is looking to get it's hands on unburnt parts of the South Coast and East Gippsland.**

The wood chip industry needs to transition to plantation forests and cease the logging of native forests which even before the fire season of 2019/20 have so intensively degraded the forests of our area. But in consideration of all that we have lost over this last summer - and all that we are predicted to lose in a climate changed future - I beg of you to not allow this proposal to go ahead.

Regards,

[REDACTED]  
[REDACTED]

**Moruya NSW**



[From The Embers - Stories from the Australian Bushfire Crisis](#)



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** DA at chip mill Timber optimisation hub  
**Date:** Friday, 8 May 2020 3:09:52 PM

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I would like to object to the increased capacity saw mill in Eden where the chip mill burnt down.

Our native forests need to be protected not logged more.

The damage to the chip mill could be fortuitous to our forests and although I would like see it not rebuilt at all, increasing the capacity would be abhorrent.

I have never understood how we could justify the massive number of tonnes of native old growth forest being put on ships and sold for a pittance to a foreign business.

I know that history will not be kind to people making these mistakes, when we look back and wonder why we destroyed our environment it will be obvious the chip mill should not be rebuilt.

Please register my objection to the DA submitted for the timber optimisation hub as I believe it would be damaging to both our environment and the economic development of Eden due to loss of jobs at the hardwood sawmill.

Kind regards,

[REDACTED]

[REDACTED]

Kanoona NSW 2550

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[REDACTED]

[REDACTED]  
Bermagui, NSW 2546  
Australia

[REDACTED]  
[REDACTED]  
email [REDACTED]  
[REDACTED]

12 May 2020

Mayor and Councillors,  
Bega Valley Shire Council

Dear Mayor and Councillors,

### **Objection to DA 10-2020-81-1 Eden Timber Mill Expansion**

We wish to lodge our formal objection to this DA 10-2020-81-1 in respect of the construction of a log sorter, sawmill, pallet mill and briquette plant at Eden. As residents since 2005 and owners of two Bermagui properties, our objection is based on three principles:

- there are significant issues not properly addressed in this DA,
- it is not an appropriate time to approve a DA for a \$14.5m major expansion of the Eden Timber Mill when the community is totally distracted by personal issues surrounding the Covid 19 lockdown, and
- there are many flow-on land use, economic and environmental issues post the recent bushfires that Council needs to address before giving any approval.

The logging of our native forests is a highly divisive community issue and this DA and related issues need to be thoroughly examined and advertised to the community.

This is also a very strategic decision by Council that will affect the long-term economic future of the Shire. In its recent Draft Local Strategic Planning Statement, Council is promoting the pristine environment of the Bega Valley to attract new population, businesses and tourism. The recent bushfires and the flow on environmental effects of this DA are partly dismantling this strategic vision.

### **Lack of Advertising to Community**

This significant DA was lodged with Council on 23 March 2020 at the height of the Covid 19 health crisis. There has been no mention of this DA in Council News, local newspapers or community newsletters.

Given the environmental and economic significance of this DA, consideration of the DA should be deferred by Council until a thorough community consultation process is held. Apart from the DA, all the related environmental and economic issues need to be canvassed with the community.

### **Bushfire Effects Not Addressed**

The Council may see itself as just responsible for approving or not a commercial DA, based on whether it meets all the necessary rules and regulations. we think however, Council's responsibility runs much deeper in this case, given that 66% of the shire is native forest (26% State Forest, 40% National Park) and 60% of the shire burnt in the recent bushfires.

Within all the DA papers, we can find only one paragraph in the Statement of Environmental Effects (page 22) that provides any post bushfire information or update. This is just not good enough, given the severity of the recent bushfires, both in the Shire and as they affected the woodchip mill.

### **Land Use, Economic and Environmental Issues**

With 60% of our shire burnt in the recent bushfires, including large tracts of native forest, it is difficult to comprehend that we can immediately decide to continue logging 150,000 tonnes of these forests each year. The whole forest land management issue needs to be addressed with State Government directly.

Policy makers and this Council must recognise that land management including logging operations has profound effects on fire severity and fire frequency. Efforts to prepare for wildfires therefore require responses to historic and current land management practices. Certain standards for utilisation of our forest resources need to be

mandated, and independent third parties empowered to ensure that in the event of DA approval these standards are met.

A better balance between the logging industry and tourism industry needs to be reached that more accurately reflects their economic and environmental importance to the region.

### **Councillor Legal and Policy Compliance**

Under the Local Government Act, Councillors have a duty to represent the community. As explained above, there are many flow-on land use, economic and environmental consequences associated with this DA which have not been properly addressed as yet in this DA process.

Additionally, if this DA is approved without a more thorough review of its environmental implications, there is a distinct inconsistency with two of Council recent policy statements in 2019 around climate resilience; both with the "Climate Emergency Statement" (CES) and the draft Climate Resilience Strategy. The Mayor, Kristy McBain, on release of the CES said "Climate change goes beyond partisan politics, or state or federal responses. It is critical to mobilise all levels of government in order to inspire change and coordinated policies". Are there "triple bottom line" (economic, social and environmental) overall advantages to the shire from this DA proposal?

### **Height of Buildings**

It is noted on page 77 of the Statement of Environmental Effects (SEE) that the maximum height of the new buildings allowed by Council LEP is 14 metres. The new shed buildings at 11.5 metres are within this limit, with the height of the briquette plant chimney running to 16 metres which is also permitted. On this basis, the development is stated to have a low visual effect as it will blend in with the existing viewed landscape and established trees will provide filtering of the views to the proposal (see page 10). The anomaly is that the new buildings surround a pre-existing incinerator which is 30 metres in height (Plans page 14). The incinerator is not operational, however viewed from a distance, the incinerator gives every appearance as being part of normal operations and to the uninformed eye would be a highly visible part of the mill operations.

Other contributing issues to the poor visual aspect of the mill operations are the burning of the perimeter trees in the bushfire, the smoke from the briquette plant chimney and the giant stockpile of woodchips. No photos of the site and surrounding trees post the bushfire are included in the DA - it is suggested that these photos be supplied. We also suggest that Council require the dismantling of the incinerator, impose a height limit on the woodchip pile and require further tree planting on the harbour perimeter.

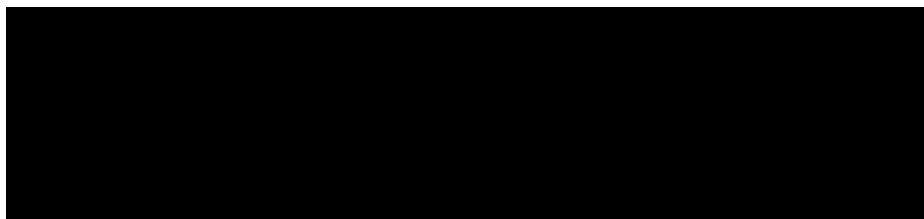
Council needs to consider the poor visual impression of this plant for environmental and other tourists to the area. This is most relevant to the passengers aboard the cruise ships as they come into Eden harbour to dock at the port. The visual impact of the mill operations for cruise ships is not addressed in the DA.

### **Chimney on Briquette Plant**

It is noted on page 10 that "the chimney would have a visually identifiable plume as the plant will burn sawmill and woodchip residues at approximately 10% of processing capacity with emission control measures designed to meet NSW EPA standards". There is no explanation of the economics in building a facility that only operates at 10% capacity. Council should require some periodic reporting of chimney emissions by an appropriate third party acting as regulator.

As noted earlier, Council is not in control of two-thirds of the land in its shire, being State Forest and National Park, which significantly inhibits Council's monitoring of land use in these areas and has implications for the land use it does control. Whether or not Council takes the regrettable decision to approve this DA, it should use this opportunity to develop regular formal dialogue with State Forests, timber mill and RFS as to their logging plans, remediation of logged areas, firebreaks and access road maintenance and development. As the opportunity arises Council should be encouraging the retention of old growth forests and progressive reduction in logging of native forests for woodchips.

Yours sincerely,



**From:** [REDACTED]  
**To:** [RecordsMailbox](#)  
**Subject:** Do not build the Eden Woodchip Mill!  
**Date:** Sunday, 10 May 2020 5:41:24 PM

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As 80% of the forest that were to be logged has been destroyed in the Bushfires it begs the question  
Is this a viable business?

Why waste money on this white elephant when there are better business opportunities that will provide a lot more than the 20 jobs the mill is offering.

Think of the future and let go of this destructive climate changer..... the community will thank you and so will the planet!

[REDACTED]