

18 September 2006

Resource Planning & Development Commission,
GPO Box 1691, Hobart, Tas. 7001

Dear Sirs

Submission re proposed Pulp Mill Integrated Impact Statement

I submit that an IIS for the proposed Pulp Mill in the Tamar Valley must be seen as seriously defective unless it has specifically included a Risk Management assessment performed in accordance with Australian Standard AS/NZS 4360 (2004) as an absolute minimum. Because this proposed development is close to centres of significant population density (in addition to its own workforce), such a hazard/risk assessment must determine and publish contours of societal risk (i.e., that risk associated with significant areas or times of population density) for an area of 50 km radius or until the risk is found to be acceptably low in terms of the Standard.

It is essential that people living or working within the Tamar Valley be made aware of these risk contours so that they can make informed decisions in their daily lives - hence the need to publish such contours openly. It is well known that industrial accidents do happen (Bhopal, 3-mile Island, pulp mill black liquor boilers, etc.). To quote from an insurance company re the black liquor boiler only, "Comprehensive automatic safety instrumentation, well-trained operating personnel and regular and careful maintenance of the boiler are therefore indispensable for safe operation." How is the general public assured of this without a complete risk assessment in accordance with the Australian Standard?

There are many hazards arising from this proposal which have not been risk-quantified. For example, what is the risk that climate change in the next 20 years will reduce the annual rainfall in northern Tasmania so that the water supply for this mill would so far deplete resources that domestic rationing would be required? Could it, should it, use recycled water from Launceston rather than quality human consumption water? More information on that option is surely needed as a matter of priority for long term operations.

Yours faithfully,

Owen G. Ingles



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