

Wadsley's reply to Gunns July 2007 re potential mill dioxin levels

Reply to Gunns' response to submissions under the Commonwealth EPBC Act. A copy of this document has been forwarded to the Hon. Malcolm Turnbull, Commonwealth Minister /for the Environment and Water Resources.

Gunns continues to promote errors of fact and analysis. In their reports (draft IIS, supplementary material, response to EPBC submissions) Gunns' expert, Toxikos Consulting, has made three significant errors with respect to estimating the impact of dioxins on the marine environment near the proposed mill outfall at Five Mile Bluff:

1. A transcription error of September 2006 underestimated dioxin concentrations in the effluent by a factor of 45 (since corrected);
2. Incorrect application of a US EPA protocol underestimated dioxin concentrations (reported in their /Human Health Risk Assessment/) by a factor of 338; and,
3. Incorrect use of new site specific parameters (referenced in Gunns' response) underestimating dioxin concentrations in Five Mile Bluff flathead by a factor of 140.

Gunns evades the issue of whether these errors have been made. They simply suggest that anecdotal evidence and poor science be substituted for a quantitative environmental impact assessment even though there is a credible and serious threat posed by mill pollutants to commercial and recreational fisheries, to the Low Head ecological community and to human health.

Their approach is overly simple, not supported by fact or detailed analysis, and is inadequate for the purpose of Mr Turnbull making an informed decision to approve the project under the EPBC Act.

In summary,

Toxikos make serious errors in their analysis using recently measured site specific parameters and underestimate dioxin concentrations in Five Mile Bluff flathead by a factor of 140;

My analysis shows that the average dioxin concentration in these fish will be 13,200 pg/kg, more than twice the Australian action limit of 6,000 pg/kg.

Toxikos evade the issue of whether or not they correctly implemented the US EPA protocol for the calculation of dioxin levels in sediment—their failure to properly address this issue casts doubt on the credibility and reliability of their analysis and reports.

No scientific case is made to support Gunns' assertion that the proposed Bell Bay mill will have negligible amounts of dioxins in the effluent.

The proposed Tasmanian regulatory limit for dioxin is too high given the site specific issues governing the Bell Bay pulp mill.

It is still my view that, with respect to dioxin contamination, the likely impact on the Tasmanian coastal and Commonwealth marine environments will be sufficient to pose a significant risk to marine life, to commercial and recreational fisheries, and to human health.

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