

## Tasmanian Branch of the Australian Medical Association

### Submission

#### **Re: Draft Guidelines for Integrated Impact Statement (IIS) for Proposed Kraft Pulp Mill in Northern Tasmania**

The Tasmanian AMA would like to take this opportunity to provide the Resource Planning and Development Commission with comments on the Draft Guidelines particularly on health-related matters. The AMA would like a transparent process of best practice methodologies applied to assess possible impacts on community health. We have identified five core issues in this regard:

1. Effective public consultation;
2. Respiratory health;
3. Odour;
4. Bioaccumulation of organic discharge;
5. Primary care provisions.

With specific reference to the IIS guidelines the AMA recommends the following additions:

#### **SECTION 3 (PUBLIC CONSULTATION):**

The IIS must detail how the public consultation process will:

1. Capture the wider community at all levels;
2. Provide unbiased information on advantages and disadvantages of the proposed mill;
3. Generate meaningful community debate, e.g. public forums for the dissemination of information.

**Reasoning:** A lack of meaningful, open and wide public consultation will generate, subsequent to any pulp mill decision, bad feelings, emotions and community resentment which is an adverse health consequence.

**SECTION 6.2 (DETAILS OF EXISTING ENVIRONMENT) Subsection (14) and (15):**

The IIS must demonstrate that the baseline data, collected prior to modeling, is sufficient to confidently assess and quantify changes to air quality in the entire Tamar Valley region. This must include all seasons, emission data from existing sources in the Tamar Valley including Launceston, and meteorological data from the Longreach site.

Reasoning: The Tamar Valley air shed, particularly Launceston, is already stressed. The impact assessment must therefore “*go the extra mile*” to ensure optimum data collection for subsequent modeling. The best dispersion model is only as good as the data which is put into it.

**SECTION 7.8.2. (ATMOSPHERIC EMISSIONS) Subsection (5):**

The IIS must use the best available dispersion model.

Reasoning: See above under Section 6.2, Subsection (14) and (15).

**SECTION 7.8.2. (ATMOSPHERIC EMISSIONS) Subsection (6):**

The IIS must be able to demonstrate that there will be no detectable odour in the local community.

Reasoning: Odour is not only a nuisance but can have adverse health effects. It is one of the most common concerns of communities located near pulp mills worldwide.

**SECTION 7.7 (HEALTH IMPACT ASSESSMENT):**

The IIS must include a detailed quantitative, epidemiological assessment of mortality and morbidity associated with all changes to the air shed using information from air dispersion modeling.

Reasoning: Scientific methods are already available for such assessments. The AMA’s preliminary assessment concluded that health effects from additional emissions are probably the major health issue to be considered and quantified in respect to the pulp mill development.

**SECTION 7.8.1. (WASTEWATER EMISSIONS) Subsection (5):**

A detailed quantitative assessment of any adverse health effects from bioaccumulation of organic pollutants such as organochlorines in the food chain must be documented in the context of consumption of seafood either via commercial or recreational fishing/collection methods.

Reasoning: Organochlorines and related organic chemicals are known for adverse health effects and bioaccumulation. This issue has also historically led to significant community concerns.

**SECTION 8.4. (IMPACT ON PUBLIC REVENUE AND EXPENDITURE)  
Subsection (1):**

The IIS should consider additional resources and their funding to provide primary health care in the region.

Reasoning: An additional increase of population will put additional demands on already stretched primary health care resources in the region.

**AMA Position**

The AMA holds no position for or against a pulp mill but wants to ensure that reliable health information is generated through the IIS to allow constructive community consultation and debate with an outcome which is in their best long term interest.

Yours sincerely,

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Chief Executive Officer