

WOODCHIP EXPORT PROPOSAL

WHITTAKERS LTD

Report And Recommendations
of the
Environmental Protection Authority

Environmental Protection Authority
Perth, Western Australia
Bulletin 346 September 1988

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Whittakers Limited has applied to the Commonwealth Government for a licence to export 50 000 tonnes per annum of woodchips derived from the chipping of sawmill wastes. The woodchips would be supplied from several sawmills, including an expanded Greenbushes mill operated by Whittakers, and exported through the Port of Bunbury.

A Notice of Intent outlining the details of the proposal was prepared by Whittakers and comment was sought from the Shire of Bridgetown-Greenbushes. Discussion was also held with several local landowners.

The Authority has concluded that the proposal is environmentally acceptable as it relates to the conversion of sawmill residues into woodchips. In addition, the Authority has been advised by the Department of Conservation and Land Management that no additional area of State Forest would be subject to harvesting as a consequence of this proposal.

The recommendations of the Authority on this proposal are:

RECOMMENDATION 1

The Environmental Protection Authority concludes that the proposal by Whittakers Ltd to convert sawmill wastes into woodchips and to export those woodchips through the Port of Bunbury, as described in the Notice of Intent, is environmentally acceptable, subject to the commitments in the Notice of Intent and the Recommendations in this report.

RECOMMENDATION 2

The Environmental Protection Authority recommends that no whole logs be chipped and only wastes from sawmilled logs be available to be chipped.

RECOMMENDATION 3

The Environmental Protection Authority recommends that Whittakers Ltd obtain a Works Approval and Licence under Part V of the Environmental Protection Act for the proposed expansion and operation of the Greenbushes sawmill.

1. INTRODUCTION

The operator of the existing sawmill at Greenbushes, Whittakers Limited, has applied to the Commonwealth Minister for Primary Industries and Energy to export up to 50 000 tonnes (approximately 41 150 cubic metres) of woodchips annually through the Port of Bunbury. This application was referred to the Authority by the Commonwealth Department of the Arts, Sport, the Environment, Tourism and Territories.

The Environmental Protection Authority determined that this proposal should be subject to environmental assessment under the provisions of the Environmental Protection Act. The level of assessment set by the Authority was Notice of Intent (NOI). A NOI was prepared by Whittakers and this was circulated to the Shire of Bridgetown-Greenbushes for comment.

In its assessment of this proposal, the Authority considered information in the NOI and comments provided by the Shire Council. In addition, the Authority also received comment from a group of local land owners.

2. DESCRIPTION OF PROPOSAL

The application by Whittakers Limited is for a licence to be issued under the provisions of the Commonwealth Export Control (Unprocessed Wood) Regulations made under the Export Control Act 1982. Whittakers has applied for approval to export up to 50 000 tonnes (approximately 41 150 cubic metres) per annum of Karri and Marri woodchips. These woodchips would be derived exclusively from the wastes generated from the milling of sawlogs derived from State Forest in accordance with contracts with the Department of Conservation and Land Management.

Whittakers proposal involves the combining of woodchips produced from sawmill residues produced by several other mills, including Monier Ltd and Worsley Timber Pty Ltd. Each of these mills currently sell their woodchips or sawmill waste to WA Chip & Pulp Co. Pty Ltd. Additional sawmills will need to provide woodchips to Whittakers before they could achieve their proposed tonnage.

Whittakers currently produces 7500 tonnes of woodchips annually and anticipates that it could produce up to 14 500 tonnes through proposed expansion of the sawmilling operations at its Greenbushes mill. These volumes represent 15 per cent and 29 per cent respectively of the total export volume applied for.

The expansion of Whittakers Greenbushes sawmill would be undertaken in four stages and involves a progressively increased intake of Jarrah sawlogs and Karri thinnings sawlogs, as well as softwood sawlogs. It is proposed that the Greenbushes mill would eventually have an intake of approximately 45 000 cubic metres per annum of Jarrah and 41 580 cubic metres per annum of Karri sawlogs.

These woodchips and those produced at other contributing sawmills would be carried by truck to Bunbury, where they would be stockpiled within the Port of Bunbury prior to loading onto ships for export. When the Greenbushes mill reaches full production woodchip transport from the mill would involve approximately 2.5 loads per working day. Existing loading facilities would be used at the port. It is anticipated by Whittakers that the stockpile would contain up to 20 000 tonnes of woodchips.

3. PUBLIC COMMENTS

As part of its assessment of the proposal, the Authority decided to seek comment on the proposal from the Shire of Bridgetown-Greenbushes. The Council has strongly supported the proposed expansion of the sawmill and indicated that its main concern relating to the proposal, relates to increased road movements to and from the sawmill. This was not considered to be significant due to initiatives that are presently being planned. The Shire pointed out that it had recently rezoned the majority of the expanded Greenbushes mill site to industrial and applied conditions to the rezoning to manage impacts associated with the expansion.

4. ENVIRONMENTAL IMPACTS AND MANAGEMENT

This assessment is about the proposal to obtain a licence from the Commonwealth Government which would allow the export of Karri and Marri woodchips through Bunbury.

The Environmental Protection Authority has recently indicated that the conversion of sawmill wastes into woodchips is environmentally acceptable. This view has been stated in the Authority's "Environmental Guidance for Land Use and Development in Southern Western Australia" (EPA 1987) and reiterated in the Authority's Report and Recommendations on the Western Australian Woodchip Industry (EPA, 1988).

This view was supported in public submissions that the Authority received on the recent WA Chip & Pulp Co. Pty Ltd woodchip proposal and during recent discussions held with community groups.

RECOMMENDATION 1

The Environmental Protection Authority concludes that the proposal by Whittakers Ltd to convert sawmill wastes into woodchips and to export those woodchips through the Port of Bunbury, as described in the Notice of Intent, is environmentally acceptable, subject to the commitments in the Notice of Intent and the Recommendations in this report.

In assessing this proposal, the Authority has considered several specific issues in relation to this proposal. These are in regard to the sourcing of the sawlogs, expansion of Whittakers sawmill and operations at the port.

4.1 RESOURCE IMPLICATIONS

This proposal is based on the use of waste from sawlogs obtained from State Forest. In relation to the expansion of Whittakers sawlog intake to its Greenbushes sawmill, Whittakers has successfully tendered to saw Karri thinnings.

The key environmental issues associated with this proposal relate to the acquisition of the timber resource. In particular, aspects that have been examined include whether or not the sawlogs from which the waste would be generated have been included within existing planning for the State Forest by the Department of Conservation and Land Management and whether this application would have any effect on other State Forest resource users.

The resource for this proposal would be derived from sawlog harvesting and not involve chip logs. Advice received from the Department of Conservation and Land Management indicates that this proposal would not lead to any additional area of State Forest being cut beyond that proposed in the

Timber Production in Western Australia strategy (CALM 1987). The sawlogs which would provide the waste are within the volumes nominated in the Timber Production strategy.

The Authority considers that the environmental impacts associated with the harvesting of the sawlogs in State Forest has already been assessed in its Report on the Western Australian Woodchip Industry (EPA 1988). In particular, the Authority specifically addressed and made recommendations regarding the harvesting and use of mature and regrowth Karri and harvesting within the Jarrah/Marri forest.

The Authority concluded that there is scope for WACAP to produce up to 750 000 tonnes of woodchips from resources in South-Western Australia. The limits to producing woodchips from old-growth forest outlined in the Timber Production Strategy are:

1988 - 1990	583 000 cubic metres
1991 - 1995	553 000 cubic metres
1996 - 1998	442 000 cubic metres

The shortfall between woodchips derived from old growth forest and from the quantity sought by WACAP would be made good from thinnings from regrowth forest, or eucalyptus plantations on private properties.

Further, the Environmental Protection Authority noted the volume of woodchip production from old growth forest described in the Timber Production Strategy and recommended that this be strictly observed.

As mentioned previously Whittakers, Monier and Worsley Timber currently sell their sawmill waste, in the form of woodchips or boxed hearts, to WA Chip & Pulp Co Pty Ltd (WACAP). One of the consequences of this is that the resource of wood available to WACAP from these traditional sources would decline. The Department of Conservation and Land Management has advised that the loss of this resource to WACAP will not result in more State Forest being cut, but rather that logs of a lower standard presently cut during normal integrated harvesting operations but currently remaining in the forest would be taken.

On the basis of this advice from the Department of Conservation and Land Management and implementation of the Authority's recent recommendations on WACAP's woodchip application, the Authority considers that this proposal should result in no additional significant environmental impacts from harvesting operations undertaken in State Forest and should assist in ensuring that the best use is made of the timber resource of the State Forest.

Whittakers Ltd proposes to supply only a portion of the woodchip resources required to achieve the licence application volume. Whittakers currently produces 7 500 tonnes per annum of woodchips from sawmill wastes. This represents only 15 per cent of the application. Even with the significant expansion of the Greenbushes mill outlined in the Notice of Intent, Whittakers will still only supply 14 500 tonnes of woodchips, approximately 29 per cent of the proposed total. The other participating mills indicated in the NOI, Monier Ltd and Worsley Timber, do not produce sufficient to make up the remainder.

The Authority considers that only wastes from sawmills should be accepted for chipping, regardless of the supplier. In addition, there should be no further allocation of whole logs for woodchipping.

RECOMMENDATION 2

The Environmental Protection Authority recommends that no whole logs be chipped and only wastes from sawmilled logs be available to be chipped.

4.2 GREENBUSHES SAWMILL

The Shire of Bridgetown-Greenbushes recently amended its Town Planning Scheme which covers the Greenbushes sawmill site, to recognise the proposed expansion and to reflect more accurately the existing and proposed use of the land. A set of conditions was applied by Council to the approval, including the need to retain and maintain buffers around the site, drainage control from the site and use of portions of the land.

The proposed expansion of the Greenbushes sawmill is based partly on the rationalisation of Whittakers sawmilling operations and also on the sawmilling of Karri thinnings and pine logs. The expansion includes the installation of kilns for drying the sawn timber. This part of the expansion will require the issuing of a Works Approval and Licence under the Environmental Protection Act.

The existing woodchipper at the mill has sufficient capacity to produce the additional 7000 tonnes of chips proposed by Whittakers.

RECOMMENDATION 3

The Environmental Protection Authority recommends that Whittakers Ltd obtain a Works Approval and Licence under Part V of the Environmental Protection Act for the proposed expansion and operation of the Greenbushes sawmill.

4.3 PORT OPERATIONS

The Whittakers proposal calls for the woodchips produced by the contributing mills to be stockpiled within Bunbury Port Authority land prior to loading onto vessels. This small stockpile, located adjacent to the larger WA Chip & Pulp stockpile, should not significantly intrude into the existing amenity of the area.

Ship loading would be undertaken using existing covered loading facilities. It would not be expected that loading would present any dust problems. In the event of any problem arising, the proponent should take remedial action, as required by various statutes.

5. CONCLUSION

Whittakers Limited has proposed that the waste generated from its expanded sawlog milling operations would be converted into woodchips and exported. Other sawmills could also provide woodchips for export under the proposal.

The proposal aims to improve utilisation of logs produced as part of harvesting operations in State Forest.

The Authority considers that the proposal to produce and export woodchips from waste from sawn timber production is environmentally acceptable.

6. **REFERENCES**

Department of Conservation and Land Management (1987), Timber Production in Western Australia - a strategy to take WA's south west forests into the 21st century.

Environmental Protection Authority (1987), Environmental Guidance for Land Use and Development in Southern Western Australia. (Bulletin No. 319)

Environmental Protection Authority (1988), The Western Australian Woodchip Industry - Report and Recommendations of the Environmental Protection Authority. (Bulletin No. 329)

7. LIST OF COMMITMENTS BY THE PROPONENT

1. The mill design will be completed in accordance with Standards Association of Australia in all respects and in particular will recognise industrial noise legislation.
2. Environmental matters associated with the mill will be fully respected. A large number of trees will be planted around the the mill site to reduce the effect of noise and dust on people living in the locality.
3. There will be no chemical processes involved in the conversion of our timber.
4. There will be a significant reduction in smoke emission from Whittakers existing burner.
5. All conditions attached to the Shire of Bridgetown-Greenbushes' approval of Town Planning Scheme No 4 Amendment No 2 (North Greenbushes Townsite - Extension of Industrial Zoning) will be met by the company.