

7.21. Clive Stott

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Tasmania. [REDACTED]

7th March 2011
Without Prejudice

Mr. Jim Wilson

Plantation Standards and Services Manager
Gunns Ltd.
76 Lindsay Street
Launceston
Tasmania. 7250

Dear Sir,

Plantation Burning Policy

I refer to your recent email and telephone call regarding Gunns Limited Proposed Plantation Burning Policy.

You are seeking my input into this policy; acknowledged the amount of time I have invested on this issue; and would like my comments as to where Gunns Limited have got to so far with the Policy.

I note you mention, "*Gunns Limited are in the process of developing a policy on plantation burning in Tasmania.*"

This tells me Gunns are admitting to NOT having a policy on plantation burning in the past if as you say Gunns are at this point developing 'a policy'.

Plantation Burning Policy:

In this day and age a burning policy is simply out of tune with community expectations.

In recent years much has been learnt about the harmful effects of smoke and it is now believed to be more harmful than first recognised.

The Precautionary Principle must be applied and burning should be stopped at the source. Deliberate burning means deliberate pernicious smoke.

Low intensity fires do not mean low intensity smoke; quite the opposite in many cases.

1 Low intensity fire:

Where have you got to so far?

Sadly nowhere if the Principles of this policy are to use low intensity fire.

Low intensity fire is capable of causing large quantities of toxic smoke which can be inhaled for long periods of time.

Please visit <http://www.cleanairtas.com> and follow the links to learn about the harmful effects of smoke.

Gunns cannot control smoke travel or dangerous levels of smoke in some areas once a fire is lit. A simple wind change can put vulnerable people's health and lives at risk.

Vulnerable people in our community are those with for example, respiratory disease such as asthma or COPD; cardiovascular disease; some diabetics, the young, and the elderly.

A great proportion of our (aging) population are vulnerable people.

Plantation burning does not show Gunns are sensitive to avoiding smoke emissions, and maximising carbon storages as claimed.

Gunns recognises burning is not the way of the future and yet wants to keep using smoky low intensity burns.

Low intensity burns drive people indoors against their will, and restricts their right to free travel in Tasmania.

Harmful toxins from accelerants used to light the fires can adhere to breathable particles and cross over into the blood stream.

2: All plantations managed by Gunns in Tasmania

Where have you got to so far?

Gunns undertake burning with, or for, other agencies in Tasmania. Smoke is smoke. Mention has not been made of this in the document.

There have been recent changes, but Gunns I believe, still own or manage plantations on the mainland.

If this is correct these operations need to be considered by Gunns when it comes to the use of any fire in any State for the following reasons:

- i) It has been determined by EPA Tasmania that mainland smoke is known to affect the lives of people in Tasmanian.
- ii) PM2.5 particle pollution from burns can travel up to a 1000km and stay airborne for weeks.

5: Revision - A new version will be issued whenever significant changes occur:

Where have you got to so far?

If it suits, this policy document could be thrown out by Gunns tomorrowand I hope it is. It carries no weight, can be changed at will, and is worded to allow Gunns to keep burning where ever, and whenever, they like.

Gunns are not exempt from our over-riding and principal Environmental Management and Pollution Control Act (EMPCA -1994):

The fundamental basis of EMPCA is the **prevention, reduction and remediation of environmental harm.**

While this is defined very broadly in section 5 of the Act as:

"any adverse effect on the environment (of whatever degree or duration) and includes an environmental nuisance" (the latter is defined as 'the emission of a pollutant that unreasonably interferes with, or is likely to interfere with, a person's enjoyment of the environment')".

This includes deliberately lit low intensity fires.

From the amount of time I have invested in this issue I do not believe Gunns Limited will ever receive a social licence to cause deliberate pernicious smoke in Tasmania from plantation related burns.

I also believe plantations have spread like a cancer across Tasmania.

I feel we must be mindful of how they are managed when we have the highest rates of asthma and non-skin cancer in Australia.

I would be happy "...to meet somewhere for a coffee..." when Gunns Limited totally removes the Plantation Burning Policy from their Plantations Policy and Procedures Manual because they manage their plantations without the use of fire, and without using polluting bioenergy plants as well.

Yours sincerely,

Clive M. Stott

<http://www.cleanairtas.com>