



Latrobe City Council Submission to Opal Australian Paper Development License Application – Future Operating Configuration

October 2023



1. Introduction

The Environment Protection Authority (EPA) is seeking feedback on the Opal Australian Paper Development License Application – Future Operating Configuration. The application proposes changes to the paper Mill. Opal will reduce the number of operating plants from 3 to 2. This will change the Mill's licensed discharges to air and surface waters.

The proposal includes:

- transitioning pine pulping from the Batch Kraft Mill (BKM) to the Continuous Kraft Mill (CKM)
- taking the Batch Kraft Mill offline

Submissions on the proposed changes are required by 12 October 2023.

Latrobe City Council provides some comments around the proposed development license, but specifically the submission focuses on:

- the planning context;
- cumulative impacts;
- odour;
- noise; and
- other general comments.

2. Submission

2.1 Planning Context

Section 2.2 of the report provides the planning context for the area including zone, overlay and planning controls for the Mill site. There is no mention in this report Amenity Lifestyle Precinct and Amenity Lifestyle Investigation Area are identified in the Morwell Structure Plan, Traralgon Structure Plan and Tyers Structure Plan at Clause 11.01-1L. This also includes the Morwell to Traralgon Structure Plan at Clause 11.03-2L.

There are also strategies at Clause 13.07-1L which state:

Discourage subdivision or the rezoning of Farming Zone and Rural Living Zone land within:

- *The Amenity Lifestyle Precinct (Area 7 of the Morwell to Traralgon Structure Plan in Clause 11.03-2L and Area 11 of the Morwell Town Structure Plan in Clause 11.01-1L) due to its proximity to the Australian Paper Mill.*
- *The Amenity Lifestyle Investigation Area (Area 3 of the Tyers Town Structure Plan in Clause 11.01-1L).*

This policy has been specifically included in the Planning Scheme for Amendment C87 and was a result of consultation with the community, EPA and Opal regarding implementing separation distances from the Mill

site. It is recommended that this planning context needs to be included in the Planning Context for discussion as part of this application.

2.2 Cumulative Impacts – Air Quality

Section 7 of the report details the analysis of air quality impacts in relation to the proposed future operating configuration. The analysis shows that sulfur dioxide emissions (SO₂) at Recovery Boiler 6 will increase because of the increase production of the sulfur content of the firing liquor required in processing. The conclusion in the report is that this increase is within EPA regulations and limitations.

The assessment, however, has not considered any cumulative impacts of other developments in the region including Opal Australian Papers energy to waste development. Therefore, Latrobe City Council believes there should be a cumulative impact considered to ensure that there is not a risk to human health from the change and operating does not more broadly have impacts on the community in SO₂ emissions.

2.3 Odour

Section 7.9 of the report details the analysis on odour and overall finds that there is potential for a reduction in the odour profile at the Mill site with the proposed change in operation configuration. The assessment and analysis has not included a comparison in the work undertaken to support Amendment C104 and C87 with the introduction of the Environmental Significance Overlay Schedule 3, Amenity Lifestyle Precincts and Amenity Lifestyle Investigation Area.

Latrobe City Council believes the following should be included in this assessment to greater understand any potential impacts including:

- Discussion about the introduction of these ESO3 and policy in structure plans;
- Discussion about previous assessment undertaken to support Amendment C104 and C87;
- Outlining differences between modelling and modelling undertaken as part of this assessment, including maps. In particular noting the 10 odour unit line and adjusted buffer;
- Whether changes are recommended to these controls in relation to these findings due to the reduction in the odour profile.

2.4 Noise

Section 9.3 of the report provides and analysis and assessment on noise impacts from the proposed operating configuration. In this section, the discussion talks about the introduction of ESO3 (as outlined above). ESO3 was introduced based on odour modelling that had occurred, not noise.

The assessment does note the nearest sensitive receivers from the mill site and provides maximum recommended noise levels at these sites. The assessment then provides noise levels for all plant and equipment at the mill. However, the report does not state what the noise levels of the new operating configuration will be at these sensitive receptors.

Therefore, Latrobe City Council believes that the following should be included in the report so the noise impacts on the community can be better understood:

- Noise assessment undertaken at each location to determine what the maximum noise level is at each of the sensitive receptors;
- Map detailing the noise levels;
- Any recommendations (if required) to reduce noise impacts.

2.5 Other Comments

2.5.1 Increase to Air Emissions and Wastewater

The report concludes that in most instances there are decreases in environmental impacts in terms of the new operating configuration. However, there is an increase in SO₂ emissions and wastewater colour limit due to the change being only plantation timber. The report acknowledges that these increases are still within permitted limits.

Latrobe City Council acknowledges the decrease and the change in operation has been mainly due to the decision of state government to ban native timber harvesting from 1 January 2024. We recommended no changes to the report in relation to this, but encourage ways to seek reduction in environmental impacts as technology improves.

2.5.2 Stakeholder Engagement

Latrobe City Council also notes that the planned stakeholder engagement on page 33 of the report which includes that further engagement is to be undertaken with us. We look forward to continuing our engagement with Opal Australian Paper on the Mill site.

3.0 Conclusion

The new development license for the future operating configuration for Opal Australian Paper provide details on proposed environment and health impacts.

Latrobe City Council acknowledges the changes are required decisions outside the control of Australian Paper and there are wider impacts with the reduction of the plant equipment. We will continue to advocate around employment and economic opportunities for the community in our region.

Latrobe City Council have requested minor changes to the assessment to better understand the environmental impacts, including:

- Discussion about the Amenity Lifestyle Precincts and Amenity Lifestyle Investigation Areas in the planning context of the report;
- Discussion and analysis on cumulative impacts of SO₂ emissions;
- Updated information provided in the odour analysis to understand changes in the odour profile and how it impacts or doesn't impact current planning controls and previous assessments; and
- Updated analysis to be provided in the noise assessment to understand impacts on the identified sensitive receptors.

Latrobe City Council would be happy to have further discussion with the department in relation to our submission.