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### **Re: Environmental Impact Statement, Pacific Highway, Woolgoolga to Ballina**

The Clarence branch of Climate Change Australia was formed as a local community group to respond to climate change issues. We aim to raise community awareness and responsibility about climate change issues and impacts, to encourage everyone to conserve energy and water, to promote the increased use of renewable energy and to lobby all tiers of government to implement genuine and effective mitigation and adaptation measures to address climate change.

Thank you for the opportunity to comment on the proposed upgrade of the Pacific Highway between Woolgoolga and Ballina, and for providing an extended period for comments.

As residents of the North Coast and frequent users of the section of highway between Woolgoolga and Ballina, the members of Climate Change Australia recognise the need to improve public safety on this section of road. The long-standing goal of the NSW and Australian governments to upgrade the highway to dual carriageway standard is also recognised.

However, Climate Change Australia rejects the RMS's proposal that this goal can only be achieved by 'upgrading' part of this section of highway to a motorway standard along a completely new route that will suit only 30% of the current users of the highway.

This upgrade, in particular the 35 kilometres of new highway through the foothills of the Pillar and Summervale ranges east of Grafton in Section 3, will require the clearing of close to 1000 ha of native vegetation (948 ha for the road's alignment plus 25 ha for ancillary facilities). This is more than 36% of all the vegetation clearing associated with the entire Pacific Highway upgrade between Hexham and the Queensland border.

This will have very significant environmental impacts, particularly when one considers that a third of this clearing (338 ha) will involve the clearing of endangered ecological communities, that a further 198 ha of endangered ecological communities would be subject to edge effects, that the new route will bisect the area which currently supports the only remaining viable coastal population of emus in New South Wales and that there is no basis for suggesting that the proposed underpasses will do anything to mitigate the potentially catastrophic impacts on this endangered population of emus.

Clearing of native vegetation is listed as a key threatening process under both state and Commonwealth legislation. It is the major factor contributing to loss of biological diversity in Australia. Clearing of native vegetation is also a major source of greenhouse gases and so is a major contributor to anthropogenic climate change.

The EIS acknowledges these impacts but does not apparently regard them to be severe enough to prompt a re-think of the highway's impacts in section 3. Climate Change Australia does not regard this as a logical nor acceptable conclusion.

The EIS admits that the greenhouse gases generated from the project, mainly due to vegetation clearing in Section 3 and the corresponding loss of this carbon sink, will be high and that this spike in greenhouse gas emissions will not be offset through the combination of revegetation programs and improved vehicle efficiencies for 'about' 70 years.

This is a shocking state of affairs – in 70 years time it is likely that our usage of the highway will be significantly different to today's projections, given that it will have had to adjust due to peak oil and associated changes in transport and movement patterns.

While Climate Change Australia is glad that this impact is highlighted in the EIS, we are concerned that little detail of the calculations which lead to this conclusion are presented in chapter 18 of the EIS or in any of the working papers. The absence of this detail prevents an independent critique of the calculations. In an earlier EIS for another short upgraded section of highway at Glenugie (which involved the clearing of 85 hectares of forest), the production of greenhouse gas from vegetation clearance was grossly under-estimated (by an order of magnitude), as highlighted in Climate Change Australia's submission.

Climate Change Australia recognises that the EIS has relied on the data and methodology outlined in TAGG (2011). However we reject some of the underlying assumptions of the model – including the fact that all stems and branches would be diverted to 'construction', that bark would be diverted to 'paper' and course roots would be used for 'biofuel' (see Table 4.2 in TAGG (2011)). These assumptions are not likely to reflect the reality of clearing in the project area. Much of the material may be left in piles to slowly degrade in anaerobic conditions, increasing the likelihood of methane production, or will be piled up and burnt.

Despite these reservations, if the figures in TAGG (2011) were used, the clearing proposed in the Woolgoolga to Ballina upgrade should produce close to 1,000,000 tonnes of CO<sub>2</sub>e. The relevant sections of the histograms in figure 18.1 providing the data for 'vegetation clearing' however only appear to add up to half this amount.

Decisions made at this stage of the project will have major impacts on the future of the ecosystems of the Clarence Valley and Australia's greenhouse gas emissions.

The enormous cost of this proposal needs to be compared against the need. The RMS admits that the new highway along this route in Section 3 will serve only 30% of current highway traffic, whereas an upgrade along the 'orange' route would serve close to 100% of current highway users.

We believe that the 'orange' route, which approximates the existing highway, should be reconsidered. An upgrade along this route to arterial road standard will not only lead to improved public safety benefits to the majority of highway users, it will have lesser environmental impacts, will lead to the generation of fewer greenhouse gases and, following the full consideration and costing of all the overheads that must be associated with the current proposal, may actually be cheaper.

Janet Cavanaugh  
Secretary, Clarence Branch

Reference:

TAGG 2011, *Supporting Document for Greenhouse Gas Assessment Workbook for Road Projects*. Transport Authorities Greenhouse Group Australia and New Zealand