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NSW Department of Planning via ePortal

Submission objecting to the restart of the Redbank Power Station SSD-56284960

Koala Koalition EcoNetwork Port Stephens (KKEPS) objects to the proposed modification of the Redbank power station to use waste wood residues (excluding native forestry residues from logging) for energy production.

Koala Koalition is a special interest group of EcoNetwork Port Stephens; a grassroots community-based environmental and sustainability network comprising 50 community and environment groups and eco-businesses with a focus on sustainable planning.

KKEPS supports the view that all levels of Government must realise that destruction of koala habitat is inconsistent with saving koalas in the wild.

KKEPS also objected to the 2021 proposal to change from coal to biomass fuel due to concerns that if approved, the right to burn cleared native forests to provide fuel for power would see an increase in development on koala habitat in the 200km proposed radius as a source for biomass.

We are not convinced that native forest destruction will not occur in order to provide biomass to fuel this power station. Native forest destruction will diminish biodiversity and reduce habitat for wildlife survival.

Our objection to the Redbank proposal is based on current research, backed up by world events that we are in climate and extinction emergencies:

- 1. We argue that burning biomass is not a 'green' initiative as claimed;**
- 2. This project claims there are a number of selling points yet a key plan still needs approval;**
- 3. We are concerned that approval to burn cleared native forests for energy will see an increase of clearing of koala habitat;**
- 4. The impacts of clearing for biomass have not been adequately addressed.**

1. Burning Biomass will not provide 'green' baseload renewable energy.

Green initiatives are normally carbon neutral or have a net gain result for the environment, although neither of these seem to apply to this project.

This revised EIS claims that “the information contained in the statement is neither false nor misleading” EIS p2, yet it states that the project will use ‘ecologically sustainable biomass’ to deliver ‘near net zero’ CO2 power generation. ¹

The Executive Summary of the 2024 version of the Environmental Impact Statement (EIS) states that “[t]he current proposal is seeking approval to restart the Redbank Power Station using biomass fuels (**excluding native forestry residues from logging**), generating a sustainable fuel and lowering CO2 emissions near net zero as a continued development of the existing approved power plant facility” ² but this is potentially very misleading. While a move away from using biomass from native forest logging is welcome, it could be seen as a way to garner support given that almost 70% of Australians support an end to native forest logging in New South Wales and Tasmania, and because Victoria and Western Australia have already ended native forest logging. ³

Although the ‘biomass’ wouldn’t be from logging operations as such, this proposal is planning to use ‘biomass’ from “approved land clearing operations (from existing civil and road works)”, and ‘biomass’ from “invasive native species on agricultural land as approved by Local Land Services NSW” and “potentially a limited amount of purpose-grown biomass”. ⁴

The EIS states that the ‘energy crops’ will take approximately four years before they have enough above ground biomass to be harvested which means the initial operations could be unsustainable for at least four years while the biomass is sourced from land clearance. Their choice of biomass crop is yet to be decided but the most likely species for “quick-rotation coppicing are eucalypts and mallees”. ⁵

The EIS estimates that Redbank could burn “up to 700,000 tonnes of dry equivalent biomass per annum (approximately 850,000 tonne per annum at 25% moisture) as a fuel for conversion into electricity”. ⁶

On the matter of emissions, the DPIE NSW Climate and Energy Action’s Net Zero Plan (2020 to 2030) aims to achieve a 35% reduction. ⁷

The NSW Climate Change (Net Zero Future) Act 2023 sets emissions reduction targets for NSW as:
50% reduction on 2005 levels by 2030
70% reduction on 2005 levels by 2035
Net zero by 2050.

The Act also sets an objective for NSW to be more resilient to a changing climate. ⁸

‘Near net zero’ is not net zero. The State objectives are clear: the rate of emissions need to reduce and the amounts are set out in the above Climate and Energy Action’s Net Zero Plan and in the Climate Change (Net Zero Future) Act 2023.

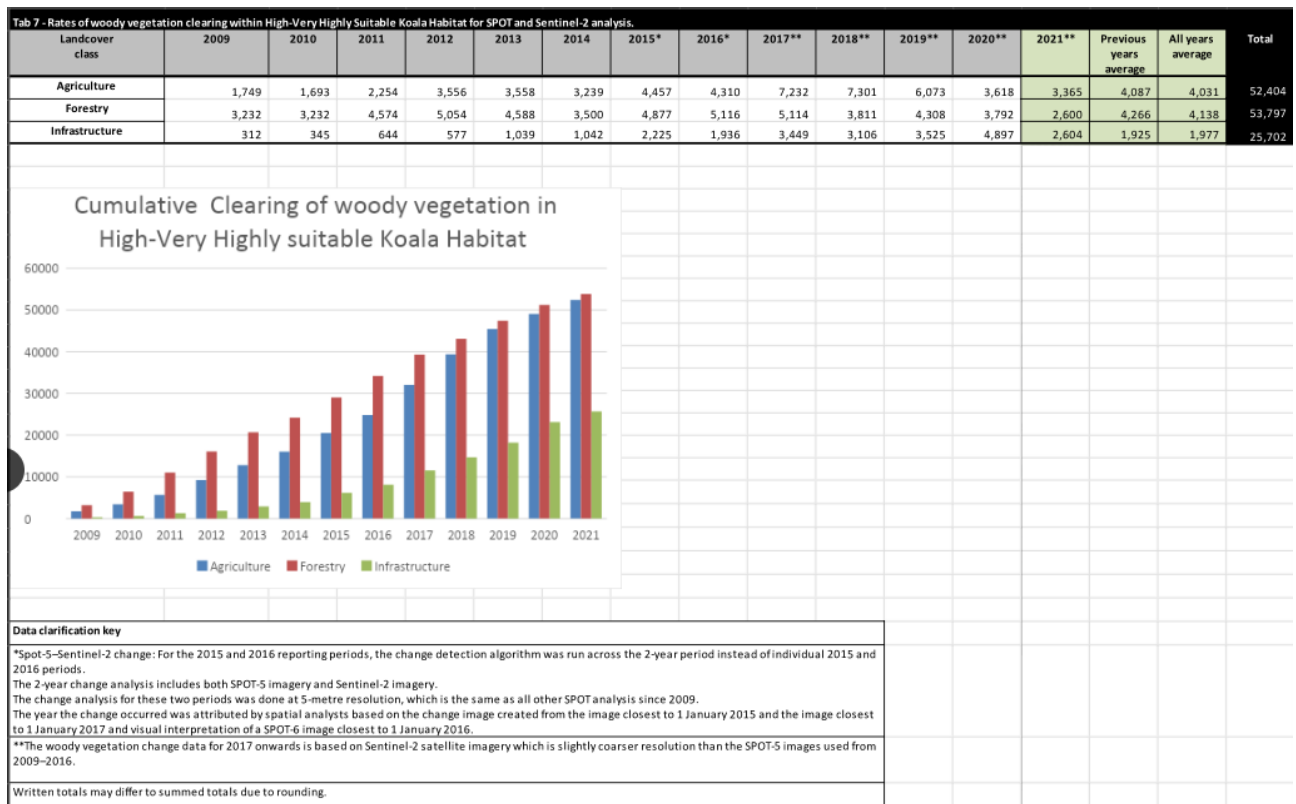
The US Government’s National Renewable Energy Laboratory states that “Burning biomass releases about the same amount of carbon dioxide [a greenhouse gas] as burning fossil fuels”. ⁹ It can be argued that the carbon released when biomass is burnt is only the carbon that has been captured and stored by the trees, yet this is potentially misleading. While trees remove carbon dioxide from the atmosphere and store the carbon in their trunks, stems, leaves, roots and in the soil, they ordinarily release oxygen as a by-product. Burning trees as biomass does the opposite and releases the carbon. As the rate of habitat clearance has continued unabated in NSW for years, there are fewer trees to mop up the carbon released from burning ‘biomass’. Planting more trees and reconnecting habitat would be a better way to meet emission targets.

2. A proposal still needing approval

There are a number of key points in this revised EIS that still require approval. The first point is the moving over to purpose-grown biomass; this needs to be “approved and declared an eligible waste fuel by the NSW EPA”.¹⁰ If this plan is not approved, will this result in more areas being cleared with Local Land Services NSW approval? Another example is the reuse of all the ash generated. It is ‘expected’ that the ash can be used as a soil amendment or fertiliser, but in order to do this it must meet the conditions of an Ash Order. Despite having a strategy that prevents the disposal of ash in landfill, if the chemical tests show that the ash can not be used, it will be stored as landfill until obtain an Eligible Waste Fuel and Resource Recovery Order and Exemption (RROE) to recover and recycle the ash. According to the BDAR, all the other power stations in NSW typically store ash as landfill.¹¹

3. Approval to burn cleared native forests for energy will see an increase of clearing of koala habitat

One of the main ways to see woody vegetation loss in Queensland and in New South Wales over time is via the Statewide Landcover and Trees Study (SLATS) Sentinel-2 data. This data is derived from a “combination of automated and manual mapping techniques to monitor woody vegetation loss”.¹² Even with cumulative levels, the NSW long term trends in woody vegetation clearing (2009 to 2021) clearly show that highly or very highly suitable koala habitat is consistently being cleared primarily as a harvestable resource but also cleared for agricultural reasons and for infrastructure projects.¹³ We are anxious that any permission for Redbank to obtain biomass from vegetation cleared either from agricultural land as approved by Local Land Services NSW, or from land cleared for development, will only result in further habitat loss and fragmentation.



4. The impact of clearing vegetation for biomass has not been adequately addressed

It is not enough to say that native vegetation would not occur during construction and operation of the Proposal, nor is it enough to say that it is unlikely that threatened flora and fauna will be impacted.¹⁴ Both of these statements refer only to the Project site and not to the sites they are acquiring biomass material from.

The EIS states that Verdant Earth are seeking to use areas that currently have no alternative economic value to farmers and landowners as plantations. The examples of sites they will target included buffer zones of mines in the area, semi-arable land parcels without other economically viable economic agricultural uses. ¹⁵

We have concerns as to how a eucalypt and mallee plantation can be managed without negatively impacting fauna who may decide to use the site. What mechanisms will be put in place to ensure that threatened species are not impacted when biomass is harvested at these sites? The biggest environmental stressors for koalas are land clearance, habitat fragmentation and climate change, although noise pollution, vehicle strikes, and fox or dog attacks also increase their physiological stress. Studies have shown that chronic stress affects their disease presentation, mortality, breeding success and resilience to climate change. ¹⁶

What fauna and flora plans will be in place in case threatened species are detected when harvesting?

Will they plant extra trees to those that will be harvested in order to meet the Hunter Regional Plan's objective to reduce habitat fragmentation and reconnect wildlife corridors?

KKEPS does not agree that this proposal is of sufficient renewable/green merit to be approved to support "the transition to renewable energy (e.g. solar and wind)". The proponent's claim that "green baseload power would be lost" is not genuine and this proposal does not warrant approval. ¹⁷

We agree NSW should concentrate on cleaner renewables such as wind and solar farms and large-scale battery systems. ¹⁸ Bioenergy projects are also desirable as methods of reusing waste. EcoNetwork is supportive of renewable projects that do not encourage forest clearing. Although we agree that "a key priority for the Hunter Region will be developing and investing in renewable energy technology to enable substantial cuts in emissions whilst responding to increased electricity demand from population growth" we believe that "adequate growth in renewable generation to offset the impacts of retiring coal-fired power plants" will be able to be found in other "greener" projects.

KKEPS supports the Hunter Regional Plan 2041 objectives ¹⁹ that support biodiversity and the environment in general and to work to more sustainable practices in tune with valuing habitat conservation. Promoting vegetation removal and its transport to fuel a biomass power facility is not in harmony with these objectives.

The analysis of alternatives in section 1.5.6 of the EIS does not seem to be very detailed. ²⁰ We submit that it underestimates the number of current proposals/approvals for truly sustainable renewables that will diminish the importance of this Redbank biomass proposal. Many projects, including urban designs, now include energy saving devices that will reduce the "sustained growth in electricity demand that if left unchecked will potentially lead to a capacity shortfall in the future" that is predicted in this proposal.

The proponent argues on that "this SSD can be classed as a 'continued development' for the purposes of the BC Regulation" and insinuates a BDAR was prepared unnecessarily.²¹ Unfortunately, the BDAR does not address the fact that vegetation will be cleared elsewhere to burn as biomass.

Similarly, they conclude that "the Proposal is unlikely to significantly impact threatened species, populations, ecological communities or migratory species" ²² without appropriate consideration that the biomass fuelling of the power station will impact species due to clearing to acquire that fuel. The

claim that biomass is a sustainable renewable source is simply absurd because trees take so many more years to grow than they do to cut down and burn.

Therefore, we do not accept their claimed justifications that the power station will “continue to produce ‘green’ electricity”.²³ Nor do we accept that simply excluding native forestry residues (presumably from State Forestry logging operations) assuages any of the substantial public opposition to the previous proposal. The proposed relinquishing of the current use of coal tailings that they said they can no longer access, does not address our concerns.

While “dispatchable” sources of generation are in critical need, we do not agree that this biomass fuel proposal should be approved as being a desirable way forward. We simply cannot continue to clear vegetation that drives the extinction crisis and fuels climate change. Approval of this proposal will quite simply lead to further deforestation. Biomass fuel is greenwashing in the extreme.

In fact, the required transport of the material to the power station will have an impact on our roads, and on our safety, as well as causing emissions that are not assessed in the proposal.

We further do not accept that the EPA has the resources to ensure the origin of the biomass is done through lawful means.

In conclusion, we submit that the restart of Redbank Power Station proposal to use ‘waste’ wood for energy production should be refused.

Yours faithfully,

Carmel Northwood
Convenor
Koala Koalition EcoNetwork Port Stephens

References

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