

# KOALA KOALITION ECONETWORK PORT STEPHENS INC.

## 17/8/2025

To: The Independent Planning Commission of NSW

Email: submissions@ipcn.nsw.gov.au

(We note that online submissions portal is currently offline to address technical issues.)

Dear Sir/Madam,

KKEPS writes to object to the proposed re-start of the Redbank Power Station (SSD-56284960).

The proposed project by Verdant Earth Technologies to repurpose the long-closed Redbank Power Station near Singleton, NSW, to burn biomass for electricity raises significant environmental concerns. While it is presented as an ecologically sustainable and near net-zero emissions initiative, the reality is that this project poses serious risks to native flora and fauna, and it threatens to exacerbate climate change through increased carbon emissions.

### **Environmental Risks to Flora and Fauna**

A core issue with the project is the planned sourcing of up to 850,000 tonnes of biomass annually, primarily through native tree clearing in western NSW during the initial years. Native forests and woodlands in this region are home to diverse and often vulnerable species of plants and animals. Clearing these habitats directly destroys critical ecosystems, reduces biodiversity, and fragments habitats, making survival and reproduction more difficult for many species.

Many native trees take decades to mature, providing essential food, shelter, and breeding grounds for wildlife. Their removal threatens species that depend on these habitats, including koalas, which are already under pressure across NSW due to habitat loss and climate impacts. The loss of native vegetation also disrupts ecological processes such as nutrient cycling and water regulation, compounding the harm to local ecosystems.

Moreover, the project's scale of clearing could exacerbate existing threats to endangered flora and fauna by reducing genetic diversity and increasing the vulnerability of populations to disease, predation, and environmental stressors. The fragmentation caused by clearing also limits the ability of species to migrate in response to changing environmental conditions, thereby reducing ecosystem resilience.

#### **Climate Change Implications**

Contrary to the project's claims of being near net-zero, the burning of biomass for electricity at this scale is expected to emit up to 1.3 million tonnes of CO<sub>2</sub> annually. This level of emissions effectively perpetuates reliance on carbon-intensive energy sources and undermines efforts to transition to truly renewable and low-carbon alternatives.

Although biomass is sometimes considered carbon neutral on the basis that trees regrow and reabsorb CO<sub>2</sub> over time, this assumption is problematic in practice. The carbon debt incurred by cutting mature native trees and immediately burning them releases large amounts of CO<sub>2</sub> into the atmosphere. The regrowth of forests takes decades to centuries to recapture this carbon, during which time elevated greenhouse gas levels continue to drive climate change.

Furthermore, native tree clearing reduces the landscape's overall carbon sequestration capacity. Intact forests and woodlands act as vital carbon sinks, absorbing and storing carbon dioxide from the atmosphere. Removing these trees not only emits carbon but also diminishes the future potential for carbon storage, exacerbating the climate crisis.

## **Broader Ecological and Social Concerns**

Beyond direct impacts on biodiversity and carbon emissions, the project sets a dangerous precedent for the use of native forests as biomass fuel. It risks encouraging further clearing and exploitation of native ecosystems under the guise of renewable energy, potentially undermining conservation efforts and NSW's commitments to biodiversity protection and climate targets.

#### Summary

The proposed Redbank Power Station biomass project presents a clear environmental risk. By promoting large-scale native tree clearing and generating substantial CO<sub>2</sub> emissions, it threatens the survival of native flora and fauna, reduces ecosystem resilience, and worsens climate change impacts. For these reasons, the project should not be approved, and alternative renewable energy solutions that genuinely protect biodiversity and reduce emissions must be prioritised.

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Yours faithfully.