

To: NSW Independent Planning Commission

Re: Submission on the proposed re-opening of Redbank Power Station

Thank you for this opportunity to submit on the proposed re-opening of Redbank Power Station near Singleton. I am a GP who has lived most of my life in the Hunter Region, though I currently live in New Zealand. I strongly oppose this proposal. Allowing Verdant Energy to use this power station to burn native forest for electricity would be a disaster for biodiversity, air quality and the climate. The assessment process that recommended approval of this project has been deeply flawed. The main points of my objection are as follows:

- For the first few years of its operation, the project will be reliant on the permanent destruction and fragmentation of native vegetation - core habitat for many threatened species.
- The approval of this project is in stark breach of the recommendations of the Independent Review of the NSW Biodiversity Conservation Act. These recommendations included much tighter controls on tree clearing and reforms to a major loophole that permits clearing of native trees under the guise of 'Invasive Native Species', a deeply misleading label. NSW must cease native forest logging and start to reverse biodiversity loss in line with these recommendations. Instead of acting on these, rates of clearing grew by 40% in 2023 compared with 2022.
- The presence of 'Invasive Native Species' is actually the result of the natural regeneration of areas that have been cleared for pasture. Over 85% of the woodlands in southern Australia have been cleared for agriculture.
- At every stage of regeneration, woodland forests provide immense value to native plants, wildlife and birds, but this proposal gives no consideration to their ecological value - including the importance of restoring connectivity for wildlife across large distances. Ensuring food and nesting resources for birds that range widely across our landscapes is critically important for their survival.
- Claims that this project is carbon neutral are completely incorrect and, I suspect, deliberately misleading. Burning wood emits more carbon dioxide than coal. The carbon accounting done for the project works under the assumption that it will burn wood from plantations that are then replanted; this is clearly not the case as the wood, at least initially, will come from native forest with no plans to replace it.
- It is scandalous that a landscape scale assessment of the biodiversity impacts of tree clearing that will supply the Redbank Power Station was not required by

the NSW Government. There has also been no requirement to assess or reveal the CO₂ emissions from the project's associated biomass burning and clearing.

- Clearly the NSW planning framework is not fit for the purpose of preventing biodiversity loss and reversing our trajectory on climate change.
- The recommendations of the Independent Review of the NSW Biodiversity Conservation Act found that the 'Clearing of native vegetation' was one of the key drivers of 'destruction, alteration and fragmentation of habitat across the state' and a primary risk to biodiversity. In response, the NSW Government made a commitment to 'end excess land clearing' which has not been delivered.
- In response to the review of the Biodiversity Conservation Act 2016, the NSW Government committed to strengthening 'the prescriptions for managing invasive native species' to 'reduce the risk of 'misuse' of this provision.
- The NSW Government made an election promise to 'introduce legislation prohibiting the burning of any forests and cleared vegetation for electricity', and has long recognised that 'burning timber and cleared vegetation for electricity is not carbon neutral and is neither clean nor renewable energy'.
- Australia has made international commitments to halt and reverse forest loss and land degradation and reverse the extinction crisis by 2030. The time taken for forests affected under this proposal to recover far exceeds 2030.
- Importantly, in 2022, and soon after it came to power, the Federal Labor Government ruled out the use of native forest wood as an eligible source of renewable energy under the Renewable Energy Act.

In short, this project is clearly a completely inappropriate substitute for coal power. It must be abandoned in its entirety. Moreover, the NSW Government must adopt the recommendations of the Independent Review of the Biodiversity Conservation Act, and end and reverse the loss of native forest.

Yours sincerely,

Dr Steven Grimson