

Submission regarding the Restart of Redbank Power Station

SSD-56284960

I do not support this proposal, for the following reasons:

1. The emissions are unlawful:

- a. They are unlawful because the International Court of Justice (ICJ) recently issued a ruling declaring that countries have a legal obligation to protect the climate system from greenhouse gas emissions.
- b. Any company and any government organization that approves this is now open to legal action to further challenge the proposal.
- c. It will also lead to legal challenges to recoup financial costs for climate damage, payable by both the company and the government using public taxpayer funds.
- d. In the Hunter Valley, several coal mine expansion proposals have faced setbacks due to legal challenges and community opposition. Notably, the Mount Pleasant coal mine expansion was blocked by the NSW Court of Appeal due to the Independent Planning Commission's failure to consider the full scope of the project's greenhouse gas emissions, including the effect of scope 3 emissions.

2. The emissions are harmful:

- a. The EIS did not adequately consider the greenhouse gas emissions. The EIS referred to unspecified and unproven Carbon Capture and Storage offsets, even though the land clearing will

remove proven and already functioning carbon stores. Retaining woodlands has been proven to be the cheapest, most reliable and long lasting Carbon Capture and Storage.

- b. The transporting of material will result in increased greenhouse gas emissions.
 - c. It also did not adequately consider the full impact of the greenhouse gas emissions from the subsequent degradation of the remaining land.
 - d. CFCs will also be produced from the burning, and increasing these is unlawful.
 - e. The burning and transporting of the material will also produce increased particulate matter which is a public health concern.
3. The proposal relies on an unscientific and unproven designation of “Invasive Native Species”
- a. Designation of functioning forest and woodland as INS is poorly and controversially defined and regulated and thus may lead to well established forests and woodland being incorrectly designated. Any areas liable to be designated as such will be continually challenged legally and by protestors.
 - b. The “Invasive Native Species” are clearly native species and they thus store carbon and provide habitat for native animal species. The use of these functioning native ecosystems would harm a significant number of animal species. The designation of recovering forest as INS would ignore the role that those

woodlands play as transition species that would lead to woodland and forest restoration.

- c. Replacing any of these species with cropland will result in a large net carbon loss, i.e. negative Carbon Capture and Storage. Retaining these large areas of native species have already been calculated as CCS by the Australian Government in its calculation of emissions to fulfil the Kyoto Protocol. Damage to them will affect our international standing in the lead up to the next COP.

4. Financial Risks

- a. The proposal will public subsidies on a non-sustainable project when true renewables can provide electricity at lower cost, while providing steady income to farmers.
- b. Taxpayers may have to pay rectify damaged land and well as pay for climate damage from the increasing “unnatural” climate disasters both in Australia and overseas.

For all of these reasons I do not support this proposal.

Yours sincerely,

Dr. John Davison-Mowle

