



18 August 2025

Forest Ecology Alliance Submission

**Re: Restart of Redbank Power Station
SSD-56284960**

A development application for the conversion and restart of the dormant Redbank Power Station to generate energy with the use of up to 700,000 dry tonnes per year of biomass as a fuel source.

Introduction

Forest Ecology Alliance (FEA) members are grateful for the opportunity to strongly object to the proposal to use biomass as a fuel source to generate electricity at Redbank Power Station.

FEA is an environmental organisation based on the Mid North Coast of New South Wales. Group members are volunteer ecologists, botanists, citizen scientists and residents who work towards the conservation of native forests and waterways.

FEA members primarily conduct field studies in local forests, co-ordinate citizen science ecological surveys, compile data and produce reports. FEA lobby, make recommendations and negotiate with various organisations and stakeholders e.g. Forestry Corporation of NSW (FCNSW) and NSW Environment Protection Authority (EPA).

FEA members devote most of our days to local forests. We appreciate the beauty and wonder of these unique, diverse forests. Yet, we also sadly witness the far-reaching impact of FCNSW industrialised logging on our landscape. We have documented rapid escalation of environmental degradation and species decline.

We have no doubt that environmental legislation does not currently ensure due diligence by regulatory bodies, such as the EPA. If Redbank Power Station were to be restarted, the forests, waterways and biodiversity of this region could not sustain the additional pressure.

As part of a public consultation process, a public meeting regarding the Redbank Power Station restart proposal held in Singleton on 11 August 2025 outlined those previous public submissions (such as those submitted by FEA) had established clear opposition to the biomass power station.

Those who made submissions largely called for an end to biomass energy options and instead requested infrastructure investment in true renewable energy sources, such as large public investment in underground power lines to expediate wind and solar power solutions.

Yet, once more we are being asked to forward submissions, and address what can only be described as reframing or greenwashing, such as the downplaying of five major concerns presented by Mark Jackson (Verdant Earth Technologies).

Reasons not to restart Redbank Power Station:

1. Biomass Burning Is Not Sustainable or Green

Verdant Earth Technologies claims that biomass is a clean, renewable source of energy. This claim is misleading and inconsistent with international experience and our local observations.

Carbon neutrality relies on rapid regrowth which can never be assured and the energy required to produce and transport long distances is counterproductive.

Biomass energy relies on an unsustainable supply chain, repeated harvesting of vegetation, and increased emissions. Once operational, the Redbank Power Station will require enormous, ongoing quantities of combustible material. From what we've seen in our local forests, this will inevitably include native vegetation.

The Cape Byron Power biomass facility at Broadwater is already sourcing native forest residue. We have documented increased clearing and truck activity around plantations and native forests in our own region. We know that many plantations (for example, Newry and Tarkeeth State Forests) once intended to supply mature trees for sawlogs, power poles etc have instead been clear-felled as younger trees and transported to Broadwater for biomass production.

2. Local Forests Are Already Under Strain

We are witnessing firsthand the **rapid degradation** of public and private forests across our region, and we see first-hand what happens once the trucks roll in to be loaded for biomass.

Many of our regional state forests, in a few short years, have transitioned from selective logging to near clear-felling under the guise of “salvage” and “low-quality log” harvesting. FCNSW Harvest Plans term these as “residue” and this is the same classification used for biomass sourcing.

Native forests in this region, including those labelled as plantations, often contain high proportions of regrowth native vegetation. Industrialised logging can never separate and log selectively. Everything in the path of heavy harvest machinery is destroyed. There is no chance of extricating endangered species or native forest vegetation unless care is taken. For example, FEA members often spend hours trying to

free a few threatened species plants from invasive weeds such as Madeira Vine and Lantana. It is a fanciful notion that Redbank Power Station can be supplied invasive weeds as a fuel source without disturbing or destroying native forests and both flora and fauna threatened native species.

3. Environmental and Health Costs Will Be High

Air pollution from wood smoke is a known health risk especially for communities already impacted by coal and mining operations, such as Singleton and Muswellbrook.

We are concerned that residents of Singleton and surrounding areas will face compounded health burdens from airborne particulates if Redbank resumes operations. Many older residents have been exposed to long-term lung damage from previous coal production operations.

It is our understanding that most calls on the NSW EPA Environment Line are complaints about wood-burning activities. This indicates growing community awareness about health risks.

Many people are also carrying long-term damage from the horrific 2019-20 bushfires in NSW. With climate change and increased drying of the planet, such fires will only increase. It is totally irresponsible to sanction adding more toxic particulates into the atmosphere.

Biomass combustion releases carbon dioxide immediately.

The large volume of diesel-powered trucks required to supply Redbank will further increase emissions, add road risk, and increase infrastructure strain in rural communities. In our region the number of trucks that dominate our roads, many of which are poorly maintained, is already a source of constant concern to residents.

4. Impact on Water Security and Land Health

Verdant's plan to use weeds and crops grown on degraded farmland raises key concerns regarding fragile water catchments.

No NSW rivers can cope with the amount of water planned for extraction.

In our region, blueberry farming in the Coffs hinterland has already demonstrated the destructive potential of intensive agriculture. Fertilisers and herbicides used for monoculture farming is not monitored effectively and has caused extensive damage to aquatic and land wildlife, including damage to human health.

Such fertiliser and herbicide regimes will be used on biomass crops and there can be no doubt that there are no checks and balances possible to mitigate the huge risks.

In this region, monoculture farming and plantation logging has diverted water from community use, caused intense soil erosion, caused gravel blockages and flood damage and destroyed delicate

ecosystems. Nutrient-rich runoff flowing into waterways is actively impacting on threatened species habitat throughout our region.

We fear Redbank's plan will replicate these harms on a larger scale.

5. Undermining of Genuine Renewables

Once committed to this large-scale biomass energy plant, work towards converting the genuine renewables like solar and wind would be delayed even further.

Investing in a polluting, expensive, and logistically complex form of energy when clean, cheap renewables are readily available is short-sighted and counterintuitive. We support large-scale public investment in grid upgrades (e.g., underground power lines) and investment in community-owned solar farms and battery storage.

6. Jobs Must Serve a Sustainable Future

Verdant claims job creation, but these are short-term, high-emission jobs at the expense of regenerative industries.

Instead, we call for funding for responsible ecological restoration and weed management by hand, not large machinery, training programs in sustainable forestry, solar installation, and native seed collection and job guarantees in truly regenerative sectors, especially for regional youth.

Further, we call for the current legislation supporting building large housing to be curtailed. It is shockingly short-sighted that many new houses are neither energy-efficient nor designed to keep residents in touch with nature. Jobs in sustainable building industries are the most practical way to reduce energy consumption.

7. The Time to Act Is Now

In 2020, Professor Graeme Samuel found that:

"Australia's natural environment and iconic places are in an overall state of decline and are under increasing threat... The current environmental trajectory is unsustainable."

At COP26, the UK's climate advisor, Nigel Topping, issued this challenge:

"Do we have the political will to do it fast enough given the very limited time we've got left?"

Australia can lead the world in ending native forest biomass burning.

Conclusion

“It’s not an investment if it’s destroying the planet.” Vandana Shiva

Burning vegetation does not prioritise environmental integrity and protection, nor human health. There can be no doubt that once started, this enormous power station will need to be kept going continuously until decommissioned again. Thus, any assurances from Verdant Technologies that native vegetation will not be used, that land clearing will not increase or that biodiversity will not be impacted appears to be greenwashing, to say the least.

Further, biomass fuel burning is counter-productive to a crucial need for a deep commitment to tangible action to address climate change impacts. Many countries adopted biomass burning and, once all available vegetation matter was burnt and ecosystem collapses escalated, they then adopted one or more of many sustainable power alternatives. There is no need for Australia to follow their fraught path, best adopt sustainable energy sources immediately.

Due to widespread native vegetation losses in other countries, Australian tall tree forests and biodiversity are now even more necessary to sequester carbon and help maintain healthy biodiversity around the planet. It is time to accept our global responsibility to conserve precious ecosystems and lead the way towards forward thinking energy solutions.

We urge decision-makers to show bold, ethical leadership.

Yours sincerely,

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On Behalf of Forest Ecology Alliance

We acknowledge the Gumbaynggirr Nation, custodians of this Country and their connections to land, sea and community.

We pay respect to their Elders past, present and emerging.

We extend that respect to all Aboriginal and Torres Strait Islander peoples.