# **Graeme Wood Foundation Submission Opposing Redbank Power Station Biomass Proposal**

The Graeme Wood Foundation strongly opposes the Redbank Power Station biomass proposal as fundamentally flawed from environmental, economic, and policy perspectives.

#### **Climate and Environmental Concerns**

The proposal's claim of zero emissions is misleading. Burning green woodchips emits up to 50% more  $CO_2$  per megawatt-hour than coal, with immediate emissions but decades-long carbon recovery through forest regrowth. The Environmental Impact Statement incorrectly assumes 850,000 tonnes of annual biomass combustion produces no direct emissions by shifting responsibility to land sector accounting—a problematic approach that obscures actual project impacts.

Current UNFCCC accounting rules net emissions across managed forest estates, potentially misrepresenting biomass as carbon negative. This delay in carbon recovery conflicts with Australia's 2030 emissions targets and Glasgow Declaration commitments to halt forest loss.

### **Biodiversity and Ecological Impact**

The so-called "waste" biomass is crucial for forest ecosystems, providing carbon storage, nutrient cycling, and essential wildlife habitat. European evidence demonstrates that biomass markets increase harvesting intensity, fragmentation, and biodiversity loss. Recent logging increases fire risk, with studies showing logged forests are more prone to severe crown fires than mature forests.

The proposal threatens to accelerate native species clearing by creating markets for "invasive native species" removal—vegetation that provides vital habitat for biodiversity maintenance.

### **Economic and Market Viability**

The Australia Institute's analysis reveals the proposal lacks fundamental economic assessment. No cost-per-unit energy analysis, cost-benefit evaluation, or viable revenue model exists. The economic impact assessment uses widely discredited modelling that assumes infinite resources and overstates job creation. With extremely low unemployment in the Hunter region, the project would merely redistribute existing workers rather than create new employment.

# **Questionable Proponents and Logistics**

The project's history involves speculative ventures rather than sustainable energy generation. Proposed biomass sourcing from Cobar—over six hours drive away—raises serious logistical and safety concerns, with potentially illegal journey times under fatigue management regulations.

#### **Superior Alternatives**

Redbank's existing infrastructure could support genuinely clean alternatives including utility-scale solar, battery storage, or hybrid renewable hubs, delivering real carbon reductions and regional employment without environmental destruction.

#### **Recommendations**

The project contradicts climate commitments, threatens biodiversity, lacks economic viability, and perpetuates unsustainable practices while superior renewable alternatives exist.

We urge NSW Government to reject this proposal, remove native forest biomass from renewable classifications, and invest in forest protection as an immediate climate solution.

#### References:

The Australia Institute, Submission on Restart of Redbank Power Station <a href="https://australiainstitute.org.au/wp-content/uploads/2024/04/P1602-Redbank-power-submission-Web.pdf">https://australiainstitute.org.au/wp-content/uploads/2024/04/P1602-Redbank-power-submission-Web.pdf</a>

**Lindenmayer, D.B., & Taylor, C.** (2022). Diversifying forest landscape management – a case study of a shift from native forest logging to plantations in Australian wet forests. *Land*, 11(3), 407. <a href="https://doi.org/10.3390/land11030407">https://doi.org/10.3390/land11030407</a>

**Mackey, B.G., Lindenmayer, D.B., & Keith, H.** (2022). *Burning forest biomass for energy: Not a source of clean energy and harmful to forest ecosystem integrity.* Griffith University Climate Action Beacon, Griffith University, Queensland. <a href="https://doi.org/10.25904/1912/4547">https://doi.org/10.25904/1912/4547</a>