

This latest attempt to salvage the ill-fated Redbank experiment should have signalled the need to examine the proposal very closely, however, the Assessment Report fails to properly respond to the concerns raised by the many submissions, and largely accepts the assertions of the proponent's reports without critical analysis.

The Fuel Plan is a fantasy, designed to cover this Trojan Horse proposal, recycling and concealing the earlier failed attempt to burn forest wood. The volumes claimed to be available from distant Invasive Native Scrub are most unlikely to be economically deliverable.

The proposal to plant tens of thousands of hectares of the environmental weed Bana Grass, producing 50,000 Tonne in the first year is plainly ridiculous. The environmental impact of this is not examined.

The Submissions Report states that the proponent: *'... will not and has not requested government approval to use these residues for power generation at Redbank'* whereas the Recommended Conditions of Consent, at section B4 Biomass fuel management, allows *'... Eligible Waste Fuels , or Standard Fuels...'*

These guidelines and regulation specifically allow 'Forestry and sawmilling residues'. Remarkable that permission to use these residues should be included though not requested. Has anybody in the department actually read these things for internal consistency, or with NSW Govt policy?

The amount of wood fuel to produce a given amount of energy also rises dramatically with increasing moisture content, as any home wood burner knows well. A 75% increase is hidden away in the modelling. Should any processing to reduce the moisture levels be found, this will require the burning of yet more diesel fuel, not accounted for in the proposal. The summary dismissal of the modelled increase in Carbon Dioxide emissions of both fails to account for any of the above, and is directly contradictory to NSW Greenhouse Gas emissions planning.

The Greenhouse Gas section of this report continues with the fiction that the emissions at the point of combustion should not be counted, rather they be 'balanced' against the expectation that the INS will regrow promptly.

This is not the expectation of the graziers from whose land this 'fuel' is to be removed. They do it as only one part of a larger plan hopeful to return their mismanaged land to profitable grazing.

The Air Quality Assessment by the proponet tells us that 'Air toxics were estimated using fuel specification reports provided'. As that specification is not tabled, we may assume that this theoretical modelling does not include the inevitable soil and other foreign matter that will accompany the projected land clearing by bulldozer and chain.

As the hypothetical processing plants for this contaminated Invasive Native Scrub' do not yet exist, and planning for them is nowhere detailed, it is difficult to accept predictions for the consequences of their combustion, or the extra amounts of diesel fuel that will be required in the process.

The Traffic Report trivialises the impact down to a turning lane at the entrance to the Redbank site. No assessment of the thousands of Tonnes of microplastics shed into lungs, soils and waterways from the tyres of the thundering 24 hour-a-day, 12 Million Kilometers a year of B-Double trucks, nor of the damage to roads necessitating more frequent repairs and re-sheeting, both highly energy-intensive and expensive for the rural communities through which this torrent would pass.

For these, and the many reasons raised by others, this project should not proceed.

Gregory Hall - for The Rainforest Information Centre, Inc.