

18th August 2025

The Commissioners
Independent Planning Commission
By Email

Restart of Redbank Power Station SSD 56284960 – proposed additional conditions of consent in response to community concerns.

Verdant Earth is the applicant for the restart of the Redbank Power Station and change of fuel source from coal to biomass (excluding native forestry residues from logging).

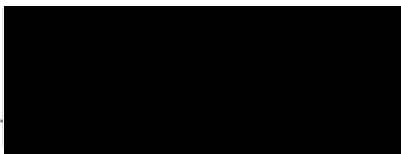
In response to issues raised during the IPC process, Verdant wishes to suggest additional conditions for the Commissioners' consideration, should the project be approved. A detailed report addressing objections has been submitted separately.

A key concern has been the use of waste from invasive native species (INS) management as feedstock. While landholders and regional stakeholders see INS control as positive for restoring degraded land, some environmental groups argued that shortcomings in the current LLS framework could allow for unintended consequences, such as over-clearing or biodiversity impacts.

Verdant's intent in using INS wood is to provide a higher-value alternative to open burning. However, we acknowledge concerns that creating a market for INS waste may encourage further clearing. Landholders see removal as beneficial, but objectors question whether LLS certificates sufficiently safeguard biodiversity.

Notably, we believe many of these concerns will be mitigated by the NSW Government's proposed amendments to the Land Management (Native Vegetation) Code 2018 (as part of the broader NSW Plan for Nature). However, to further address this issue, and other issues raised during the IPC process, such as air emissions and native forestry, Verdant recommends that the Commission considers additional conditions to alleviate concerns. Our suggestions are attached on the following page.

Yours sincerely,



Richard Poole
Verdant Earth Technologies
CEO

Proposed Conditions

B 36 Additional Conditions

36.1 No native forestry residues from logging activities

The Applicant will not utilise any Native Forestry residues from naturally occurring native forest logging activities as fuel for Redbank

36.2 Use of biomass waste from the control of invasive native scrub (INS)

36.2.1 Compliance and voluntary enforcement

The Applicant will:

- a) not obtain any invasive native scrub (INS) biomass waste from any landholder that has not complied with or breached the requirements of the Local Land Service Act and the Land Management (Native Vegetation Code) in relation to the clearing and control of Invasive Native Scrub for a minimum period of 3 years from such breach.
- b) review suppliers of INS biomass waste to ensure that the removal of invasive native scrub/species:
 - i. will improve the local environment as the species/scrub has reached unnatural densities and is dominating an area, or has invaded an area where that scrub did not occur; and
 - ii. will promote the regeneration and regrowth of a more natural and diverse range of native vegetation and biodiversity.
- c) will audit compliance of every supplier with PVP and S60Y LLA requirements including (without limitation) ensuring that:
 - i. the plants are listed as INS species for the LLS region and are regenerating or densely invading plant communities and
 - ii. no vegetation forming part of a critically endangered ecological community has been cleared
 - iii. all clearing and control sizes and percentage clearing rates have been met.

36.2.2 Economic contribution to costs only

The Applicant will:

- a) not create a significant financial incentive for landholders to clear INS over and above the existing reasons to promote the regeneration and regrowth of a more natural and diverse range of native vegetation and biodiversity; and
- b) will limit payments for INS biomass waste per tonne to a maximum of reasonably incurred clearing costs per tonne only.

36.2.3 Alternative fuels to INS

The Applicant will work diligently to develop alternate fuels to replace INS including purpose grown

fuels and the use of domestic biomass (urban waste stream) fuels. Where similar or lower in all-in-cost per tonne, the Applicant will use such alternate fuels in preference to INS.

36.3 Emissions

The Applicant will monitor and check its emissions on a 24/7 live basis and will ensure it maintains a regular maintenance and inspection program to ensure filter bag quality.

In addition, the Applicant will provide two 24-hour solar powered dust monitoring stations to be located (subject to relevant approvals) near or at the Jerry Plains school and Singelton School to provide permanent online monitoring of local area emissions.

The Applicant will add these monitors to its existing 24/7 emissions monitoring program and

- a) will maintain these stations for the life of the project or schools; and
- b) will immediately notify a designated representative of each school in the event of a high emissions reading on those monitors.