

RESTART OF REDBANK POWER STATION (SSD-56284960)

Public Meeting, 11 August 2025

14 Ian Donovan (5 mins) National Parks Association of NSW 12:10

My name is Ian Donovan. I am here today representing the National Parks Association of NSW, or NPA as it is commonly known. I hold the role of Secretary, and am also Secretary of the Hunter Branch.

As an organisation, we have been working towards the protection and appreciation of nature for just under 70 years. It was NPA that badgered the NSW Government to establish the State's basic nature conservation infrastructure, including the NSW National Parks and Wildlife Service, and a protected area network that now spans more than 10% of NSW.

NPA strongly objects to the Redbank proposal. If approved, it would have substantial off-site impacts on biodiversity conservation, biosecurity, carbon emissions and certain other matters that NPA is not directly concerned with. Both the Proponent and the Planning Secretary have failed to assess the extent and nature of these off-site impacts.

The application documents do not look beyond the development site itself. They relegate consideration of direct consequences, such as land clearing, carbon budgets, and increased risk of spreading weeds and pathogens to other decision processes and decision-makers. Yet the proposal has a direct causative nexus with each of these matters.

There is substantial uncertainty about the extent and nature of off-site impacts and risks. The proposal rests on a 1-page back-of-the-envelope plan for sourcing various fuel stocks (this is Table 2 in the Secretary's Assessment Report). It remains entirely unclear where

most of the fuel stock will come from. This applies both during the initial phase when there will be a strong reliance on so-called 'invasive native species', and during the mature phase, when it is claimed that most of the fuel will be obtained from 'purpose grown fuel crops'. We simply just don't know the where, what or how although the term 'invasive native species' does suggest a source region in the Western Division, well over 400 km away.

We are particularly concerned that the proposal will accelerate habitat loss. The proposal will effectively create an economic incentive to clear native vegetation that, in all likelihood, would not otherwise be cleared, or would be allowed to regenerate. For example, upper Hunter mine buffer and rehabilitation areas, or native woodlands in western NSW. The best use for these habitats will be to maximise their role for carbon storage and biodiversity conservation, not to feed them into a furnace.

I'd particularly like to draw the Commissioners' attention to the NSW 2024 State of the Environment Report, released by the EPA about a month ago. It includes a native vegetation scorecard.

Across all five native vegetation indicators, current status was rated as "POOR", while the overall trend was rated as "GETTING WORSE". In simple terms, loss of native vegetation and degradation of its diversity and ecological integrity is up there with carbon pollution and climate change as the State's most pressing and urgent environmental problems.

The Redbank proposal will only make things worse.

The Planning Secretary's report makes the bizarre statement that the project 'would not result in any additional disturbance to biodiversity

values outside of the existing approved operations'. On that basis it proposes that no further assessment is required.

The report also notes that clearing of Invasive Native Species is permitted under the *Land management (Native Vegetation) Code 2018* and regulated under the *Local Land Services Act*. That is undoubtedly correct. However, ^{this} that in no way lessens the statutory obligations of a consent authority to consider the impacts of a proposal under the EP&A Act. There is a direct nexus between operating Redbank and clearing native vegetation at unspecified locations somewhere in NSW. In the same way, the NSW Court of Appeal recognised that there is a direct nexus between mining coal at Muswellbrook, emissions from Japanese power stations, and climate change impacts in the Hunter Region.

As the consent authority, the Commission remains solely responsible for evaluating the proposal under section 4.15 of the Act. This applies whatever the adequacy or inadequacy of the Planning Secretary's assessment report. Having regard to what seems to be significant omissions from that report, we suggest that it isn't possible for the Commission to consider all the matters that it is required to consider under section 4.15.

The Commission needs to closely examine whether it would be in the public interest for the proposal to proceed. The Land and Environment Court originally limited Redbank to a 30 year lifespan, which is due to expire around 2030. Given the changed circumstances since the 1990s, extending Redbank out to 2055 would be completely out of step with community expectations. We therefore urge the Commission to refuse consent.

A written submission will follow.