



Peoples Climate Action Coalition

T/A Peoples Climate Assembly



The Chair
Independent Planning Commission of NSW
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Submission in opposition to the restart of Redbank Power Station

The Peoples Climate Assembly (PCA) is a coalition of various climate groups including Parents for Climate Canberra, 350/Move Beyond Coal Canberra, the ACF Community Canberra, Climate Action Canberra, Conservation Council ACT Region, and Extinction Rebellion ACT.

We are strongly opposed to the restarting of the Redbank Power station to burn biomass due to the deleterious effect it would have on climate, biodiversity, native vegetation and wildlife, air quality, health, and road traffic. Contrary to assertions by the proponent (Verdant) the project is neither “near net zero CO₂ emissions” nor a provider of “green” electricity”.¹ It has used dodgy accounting to assert that burning 700,000 tonnes of biomass annually will not produce any emissions.

As mentioned above, burning trees (biomass) is not carbon neutral. There is an immediate release of CO₂, trees do not instantaneously grow back and may never grow back. The long-term sequestration of CO₂ into trees is lost as is the soil carbon which is released to the atmosphere.

Verdant have compared the emissions of this project to high emitting coal plants rather than low emitting renewable energy such as wind and solar, which are the natural alternatives. It also proposes to off-set its emissions, not reduce them.² This is just using another accounting trick to pretend the plant is clean and green when it is not.

In the first four years of operation the plant proposes to rely on 650,000 tonnes of biomass from “invasive native species” and “approved clearing activities”.³ Land clearing in NSW is out of control.⁴ Despite the NSW Labor government committing to ‘stop excess land clearing, strengthen environmental protections and reform the biodiversity offset scheme’, clearing

¹ Jackson Environment and Planning Pty Ltd. *Restart of Redbank Power Station and Use of Biomass (Excluding Native Forestry Residues from Logging) as a Fuel – SSD-56284960 Verdant Earth Technologies Limited Environmental Impact Statement*. 20/02/2024 p4

<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-56284960%2120240220T093121.403%20GMT>

² *Ibid* p A32

³ *Ibid* Table 3.4 pp 63-64

⁴ WWF-Australia. Alarming land clearing figures show why NSW needs stronger laws now. 13 Sept 2024

<https://wwf.org.au/news/2024/alarming-land-clearing-figures-show-why-nsw-needs-stronger-laws-now/>

rates jumped by 40%.⁵ Vegetation clearing is a major driver of biodiversity decline as it directly kills animals and plants, leads to fragmentation of habitat and opens the area up to weeds. It also is a major contributor to climate change.⁶ Clearing vegetation releases carbon dioxide from the soils, and burning of the biomass immediately releases CO₂ into the atmosphere.

The term “invasive native species” is poorly defined and poorly controlled and has been used to allow farmers to clear native vegetation with minimal oversight. Land management practices in NSW are allowing the wholesale clearing of native vegetation and the associated destruction of habitat and species. Adding a financial incentive to clear land through purchase of the biomass as feedstock for the Redbank Power Station is perverse and will lead to even more clearing and habitat destruction.

A major failing of the Environmental Impact Statement (EIS) is that it only considers the environmental impacts on the power station site, not the tens of thousands of hectares of land impacted by the land clearing required to supply fuel needs for the project. It also will require the conversion of tens of thousands of hectares of land to fuel crops to supply the boilers when the native vegetation clearing runs out. While it refers to “degraded agricultural land” this is not defined nor identified. Some land earmarked for these crops is former mining land which might otherwise have been revegetated to a more permanent vegetative cover acting as a carbon sink.

Burning biomass can also have greater adverse health impacts than burning coal, and some pollutants such as CFC’s are four times higher than burning coal.

There are strong fears that the proponents, despite their assertions, will not be able to find enough feedstock for the project in the longer term and there will be pressure to access native forests. There is currently a loophole⁷ that could allow burning of native forest for energy generation, and this loophole must be closed. But regardless of this, the impact of clearing on native vegetation, especially in the western part of the state where endangered species such as the red-tailed black cockatoo and malleefowl are severely impacted by loss and fragmentation of habitat,⁸ is of critical concern.

At this crisis time for the planet, with planetary boundaries being rapidly exceeded, we need a commitment to renewable energy such as solar and wind, backed up by batteries. We do not need old coal-fired power plants such as Redbank to be repurposed to burning native vegetation (however titled), which will still lead to CO₂ emissions regardless of accounting sleights of hand suggesting the contrary.

⁵ Nature Conservation Council, *New data reveals land clearing rates in NSW jump 40% across the state*. July 28, 2025 <https://www.nature.org.au/slats2025>

⁶ Mark Howden. *UN climate change report: land clearing and farming contribute a third of the world's greenhouse gases*. Australian National University, 2019 <https://science.anu.edu.au/news-events/news/un-climate-change-report-land-clearing-and-farming-contribute-third-worlds>

⁷ Protection of the Environment Operations (General) Regulation 2022, Part 3

⁸ Nature Conservation Council, *op cit*

With NSW leading the huge increases in land clearance and habitat destruction the impact on biodiversity of providing a market incentive for clearing of native vegetation cannot be overstated. Land clearing is a key threatening process under both the *Biodiversity Conservation Act 2016* and the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*.

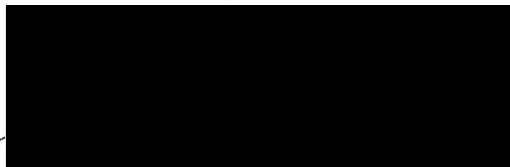
It is not even clear that the energy from this project is needed.

The project is a pollution source that will have ramifications much wider than its 18 ha footprint at Singleton, impacting tens of thousands of hectares of land across the western division and damaging its biodiversity.

Redbank must not be permitted to proceed.

Thank you for the opportunity to comment.

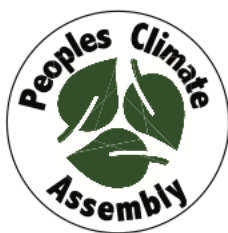
Yours sincerely



John Smith
Executive Committee

Peoples Climate Assembly

18 August 2025



The Peoples Climate Assembly (PCA) is a coalition of various climate groups including Parents for Climate Canberra, 350/Move Beyond Coal Canberra, the ACF Community Canberra, Climate Action Canberra, Conservation Council ACT Region, and Extinction Rebellion ACT. The PCA is an organisation that believes we need to Act Now to reach zero emissions at emergency speed.

The Peoples Climate Assembly acknowledges that we live on the stolen land of the Indigenous people of Australia. We acknowledge the Ngunawal and Ngambri people, the traditional custodians of the land on which Canberra is situated. Their sovereignty was never ceded. We pay our deepest respects to our nation's First Peoples and to Elders, past and present.