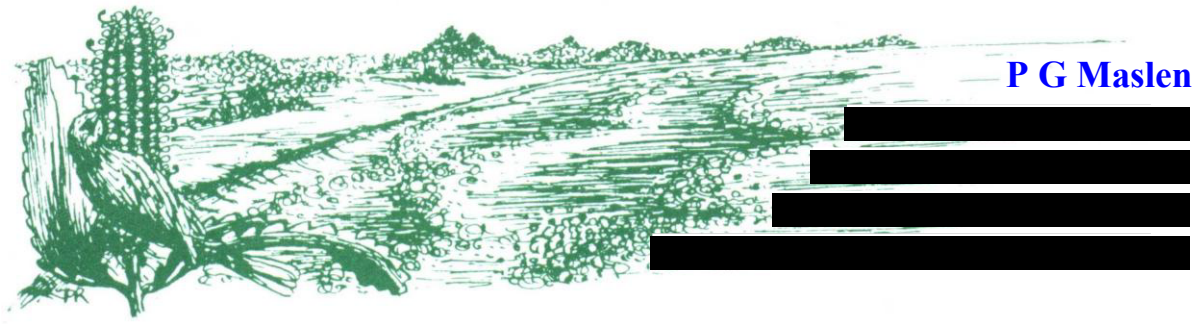




17th August 2025

Independent Planning Commission
Level 15, Suite 2
135 King Street
SYDNET, NSW, 2000

Attention: Professor Neal Menzies, Panel Chair

SUBJECT: RESTART OF REDBANK POWER STATION SUBMISSION
CASE ID: SSD-56284960

Dear Sir,

While welcoming the opportunity to submit my views, I oppose the Verdant Earth Technologies proposal to Restart the Redbank Power Station near Singleton to burn native vegetation for fuel. The proposal to burn up to 700,000 tonnes of dry biomass annually, primarily from land clearing and potentially from native forests threatens biodiversity, is not carbon neutral, and will ultimately undermine NSW's climate and conservation goals.

Native vegetation, primarily from land clearing, will provide the bulk of this in the first four years of operation. Alarming, loopholes for the use of native forests and cleared vegetation for power generation still exist and could be utilised by future governments to allow native forests to be burned. Verdant proposes converting up to 72,000 hectares of land to produce biomass crops to fuel their project long term. While this would appear to be an acceptable objective, the time to grow adequate biomass to fuel the proposed restart, is probably longer than proposed resulting in an increase of the stated required resource over a longer period. In short, a strong case for rejection exists. The project faces multiple critical risks, especially around biomass sourcing, policy compliance, and environmental integrity. These provide legitimate and evidence-based grounds for the Independent Planning Commission to refuse consent.

During initial public consultation on the project, there were so many objections that the project has now been referred to the Independent Planning Commission for decision. These objections are significant and must be heeded.

Based on reviewing the environmental impact statement (EIS) and other third-party assessments of the EIS, it is considered a vastly underplayed evaluation of the greenhouse gas emissions and other potential environmental impacts that the project is likely to have been made. It is also likely to create a large new customer for woodchips from logging operations, potentially resulting in increased logging to supply this market. Providing a market for dead native vegetation will drive increases in land clearing. The demand creates the risk that "INS" is managed in an ecologically unsustainable way.

Land clearing and associated habitat fragmentation is one of the biggest threats to biodiversity in NSW. Since the passing of the Biodiversity Conservation Act 2016 No 63, the rate of loss of native vegetation in NSW has increased significantly. Approvals for vegetation clearing are not assessed adequately commonly resulting in the removal of native vegetation

that is home to endangered species like that occurred in Lawrence with the clearing of koala habitat with a known koala population in the Banyabba Area of Regional Koala Significance. Any escalation of the loss, which is probable with the approval of this proposal, is unacceptable. This proposal is likely to provide further financial incentives for land clearing, all to feed its furnaces for electricity generation. The proposal seeks to exploit this NSW land management rules that are unequivocally failing nature and that are currently under review by the Natural Resources Commission.

The Fuel Supply and Characterisation Study - Restart of Redbank Power Station claims, "*It is proposed that Redbank will be fuelled with ecologically sustainable biomass*". The clearing and burning of tens of thousands of hectares of native vegetation cannot be described as ecologically sustainable.

The proposal relies heavily on the clearing of "Invasive Native Species" (INS), which is poorly regulated and overseen. 'Invasive native species' is a term that's been used to let farmers clear abundant native vegetation on their property with little oversight, for the purposes of increasing agricultural productivity. In informed botanical circles, an INS is a species that while being native to Australia, is invasive outside its endemic area such as in NSW *Corymbia torelliana*, commonly known as cadaghi being endemic to north Queensland. All other local species in their endemic area cannot be considered an INS and hence must not be considered as an acceptable fuel.

Although excluded from the current proposal, the loophole that allows the use of native forest trees for biomass energy production still exists. There is no guarantee that native forests won't be allowed for use under future governments.

The EIS fails to assess off-site impacts. The EIS only considers impacts on the 18ha of land the power station sits on, ignoring the potential biodiversity impacts from the thousands of hectares of land clearing required off-site. It also fails to address all the other environmental impacts associated with land clearing and logging of large areas of forests as will occur with poorly regulated land clearing and the proposed 72,000 hectares of plantation. Erosion and negative impacts on water quality are but a few.

The project says they would establish biomass fuel crops to sustain the project long term. Verdent state 'in order to meet the total required biomass demand, a total planted area of 72,000 hectares would be required' and seeks to convert grasslands to crops. The project plan specifies it will target marginal agricultural lands. The project should only use degraded agricultural lands. It does not specify how native vegetation, like biodiverse grasslands, will be protected. So called degraded or marginal agricultural land, is similarly likely to be poor quality land for viable forestry operations. Even on lands that have been traditional forestry lands using endemic tree species growth rates have been slow. An example of plantations not obtaining loggable maturity is blackbutt (*Eucalyptus pilularis*) and hoop pine (*Araucaria cunninghamii*) planted prior to the second world war in the previous Whian Whian State Forest, never obtained maturity to be logged to the extent that the area is now the Nightcap National Park, dedicated in 1983.

The claim of "*near-net zero*" emissions, due to the regrowth of feedstock, is flawed. Trees cleared for land clearing are not replaced, resulting no future growth and claimed carbon storage. Other emissions from soils and processing are not counted.

Verdent claim that burning vegetation bulldozed from agricultural lands will have a neutral effect on greenhouse gas levels. This is false. Burning vegetation will release instantaneous bursts of carbon dioxide in the air. There is no plan to replace the woody vegetation that has been cleared, resulting in a carbon storage net loss. Burning vegetation is very different to

the slow carbon release that occurs when vegetation falls to the ground and rots slowly over time.

The proposal's projected emissions from biomass burning compared to high emitting coal plants rather than wind and solar, significantly overestimates the emissions benefits. Biomass has negative and unjust health impacts including releasing air pollution. Burning biomass can have even more significant public health impacts than burning coal or natural gas. Biomass burning tends to release more particulate matter (PM), carbon monoxide (CO), and certain volatile organic compounds (VOCs). Gas burning is a larger contributor to greenhouse gas emissions, particularly methane. Coal burning, on the other hand, often results in higher emissions of sulphur dioxide (SO₂) and nitrogen oxides (NO_x). Additionally, the climate impact of biomass burning can be significant, especially when considering the loss of carbon sinks from forests. The lifecycle analysis of the project shows that the release of chlorofluorocarbons which contribute to ozone depletion are more than four times higher than burning coal.

True net-zero projects should be prioritised over projects that add increased carbon to the atmosphere.

The proponent's plans for sourcing fuel assumes that 42 tonne capacity B-double trucks move daily to and from the power station 112 times to haul the required biomass feedstock in and the resulting ash out. That is more than one truck in and out every half hour on average, significantly increasing local vehicle movements.

In 'Appendix L: Life Cycle Submission' Verdent states that 'if biogenic carbon emissions are captured before being released to the atmosphere, through bioenergy with carbon capture and storage (BECCS) this could result in an overall greenhouse gas removal'. There is no commitment in their proposal to the use of this technology. For any biomass project, carbon capture must be a requirement.

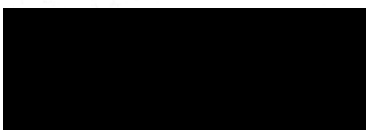
NSW Labor has had a longstanding commitment to close the loophole that allows the burning of any native vegetation for electricity, stating "Labor recognizes that burning timber of cleared vegetation for electricity is not carbon neutral and is neither clean or renewable energy".

While biomass energy may have potential in NSW in the future, further scoping is needed to determine the best opportunities in NSW that will not have unnecessary impacts on ecosystems and biodiversity.

NSW should focus on high value cleaner energy solutions like solar and wind power to obtain its renewable energy goals.

I look forward to being informed of the outcome of your assessment and a refusal of the proposal

Yours faithfully,

A black rectangular box redacting the signature of Peter G Maslen.

Peter G Maslen BE BSc