

## A Submission Opposing the Restart of Redbank Power Station.

To:

The Commissioners,  
New South Wales Government,  
Independent Planning Commission,  
Level 15 Suite 2  
135 King Street  
Sydney NSW 2000

From:

Steve Garthwin



14.08.25

I request that this Submission be considered by the Commissioners when reviewing the **proposed DA (SSD-56284960) from Verdant Earth Technologies Ltd** to restart the Redbank Power Station as a "bioenergy generator". You will receive this submission today - i.e. before the deadline of Monday 18<sup>th</sup>.

To be clear, I am **totally opposed** to this DA and think it is a "State Significant Scandal" which would disregard the recommendations of the Independent Review of the Biodiversity Conservation Act (NSW 2016), whilst breaching our present State Government's election commitment to "*introduce legislation prohibiting the burning of any forests and cleared vegetation for electricity*". In addition, the Federal Labor Government ruled out the use of native forest wood as an eligible source of renewable energy under the Renewable Energy Act and has made international agreements to halt and reverse forest loss and land degradation.

Verdant Earth Technologies as been facilitated in making this development application by a deeply flawed NSW assessment process, which has, so far, recommended approval of this climate and biodiversity disaster. I believe that the NSW Government should act urgently to reform tree clearing laws to reverse biodiversity loss in NSW. The recommendations from the Independent Review of the NSW Biodiversity Conservation Act include **much tighter controls on tree clearing** and reforms to a major loophole that permits clearing of native trees under the guise of 'Invasive Native Species' (a deeply misleading label). The presence of so-called 'Invasive Native Species' is the result of prior agricultural clearing e.g. for sheep farming. These are not weeds. They

are native shrubs and trees that are critical habitat for many species, including threatened wildlife. In the absence of clearing, natural ecosystem processes would eventually allow these areas to recover. During their regeneration, woodland forests provide immense value to native plants and animals, but this proposal gives **no consideration** to their ecological value. It is scandalous that a landscape-scale assessment of the biodiversity impacts of tree clearing that will supply the Redbank Power Station has not been required by the NSW Government.

Verdant say that the feedstock for this proposal would be sourced primarily from vegetation cleared under the Invasive Native Species (INS) framework, but, for the first few years of its operation, the project will be reliant on the permanent destruction and fragmentation of native vegetation - core habitat for many threatened species. Apparently, they propose to clear 'degraded' agricultural land to plant feedstock for their future. But burning any wood emits even *more* carbon dioxide than coal, and in some cases, emissions are reportedly double. Verdant's carbon accounting is fundamentally flawed. Their Environmental Impact Statement (EIS) wrongly assumes that burning native vegetation is not emissions intensive, and is net-neutral in terms of the carbon cycle, which doesn't reflect real-world outcomes. They claim this is clean and renewable energy. The truth is, it is a dangerous step backward. This is not green energy. It is another climate bomb that will accelerate the extinction crisis.

The EIS only considers the power station site itself. There is no biodiversity assessment of the landscapes where the vegetation will be cleared. This means the impacts on threatened species, ecological communities, connectivity, and local ecosystems have not been evaluated.

The old Redbank Power Station had the capability to operate on a wide variety of fuel sources, including renewable biomass, and although Verdant Technologies currently state that they will not use logging residues, the project is clearly designed to allow for future variation to include them. The proposal itself states that if other fuel sources prove uneconomic, they may seek approval for alternatives. Given the unreliable nature of the INS resource, it is likely this would occur.

This proposal will damage public trust and set a dangerous precedent. Creating a commercial market for burning native vegetation would incentivise deforestation and land clearing across NSW. It would increase pressure on ecosystems already in decline, particularly in the context of drought, land degradation, and invasive species. It also risks undermining *genuine* renewable energy by channelling public and private investment into high-emissions, low-efficiency technology.

This project should be assessed on the *full* environmental, ecological and climate consequences of its operations - including what it takes to supply the fuel.

This proposal is not in the public interest, it does not have a social licence, and it contradicts the urgent need to reduce emissions and protect what remains of our biodiversity in NSW.

**Please reject SSD-56284960** and protect NSW from becoming the first jurisdiction in Australia to power its grid by clearing and burning native vegetation. Verdant Earth Technologies falsely portray themselves as offering 'renewable electricity,' but burning up to 850,000 tonnes of native vegetation each year for electricity generation shouldn't be compared to wind and solar generation, which is truly renewable and clean.

Yours sincerely,

Steve Garthwin

A black rectangular box used to redact the signature of Steve Garthwin.