

Independent Planning Commission of NSW

The Ryde – Hunters Hill Flora and Fauna Preservation Society is a local environment group established 59 years ago. The aims and objectives of the Society include-

- Respect for the land and its flora and fauna and original custodians:
- The education of the membership and the community, particularly in the local area,
- in nature conservation and protection of the environment.
- The promotion of ecologically sustainable land use and development at the local, state, national and international levels.
- Advocating measures at the local, state, national and international level necessary to safeguard the environment from all forms of pollution to ensure, clean air, clean water and a healthy environment and to address climate change.

Our Society does NOT support the Verdant Energy Redbank proposal, for reasons below.

1. Environmental and biodiversity impacts are unacceptable

The proposal shows no appreciation of its impact on forests, which are crucial to the survival of our native species and to the health of the environment and humans. They play a significant role in reducing our carbon emissions and help the NSW government successfully reach its carbon emissions target. Forests are vital in dealing with the effects of climate change and the protection of our unique animal and plant species by generating rainfall, cooling the landscape and cleaning the air.

Uncleared, mature forests have a multitude of benefits which include:

- a key role in pollination for not only within the forest but outside. This benefits the agricultural industry in the production of crops as well as ensuring the ongoing existence of native plants and trees
- providing hollows for animals that rely on them for nesting and food sources. There are 174 species in NSW that rely on hollows for dens and nests
- contributing to the living conditions for many towns, from water quality in reservoirs, to greater tourism industry opportunities, and carbon storage and abatement
- being more resilient to the changing climate and catastrophic fires that are occurring as a consequence – especially in riparian areas and where there is a fire-resisting understorey
- prevention of river bank and other waterway erosion
- providing a home to 269 nationally listed threatened species in NSW
- the on-going connection of First Nations people and communities to forests and forest landscapes which are an integral part of cultural practice and knowledge

The Fuel Supply and Characterisation Study - Restart of Redbank Power Station claims *“It is proposed that Redbank will be fuelled with ecologically sustainable biomass”*. Clearing and burning of tens of thousands of hectares of native vegetation is not ecologically sustainable.

- The proposal relies heavily on the clearing of “Invasive Native Species” (INS), which is poorly defined, regulated and overseen.

- Land clearing and "INS" will provide 71% of fuel in the first year and 64% in the second year. Based on information provided by Verdant, at least 20,000 hectares of "INS" will need to be cleared to provide the required fuel levels during the projects first year.
- The proposal exploits NSW land management rules that are already failing nature and that are currently under review by the Natural Resources Commission.
- 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.
- The Environmental Impact Statement (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.
- The project says they would establish biomass fuel crops to sustain the project long term. Verdant 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. But it does not specify how native vegetation, like biodiverse grasslands and wildlife corridors will be protected.
- Land clearing and associated habitat fragmentation is already one of the greatest threats to biodiversity in NSW, threatening endangered species and ecosystems.

2. Carbon accounting under-represents emissions from land clearing

- The claim of "*near-net zero*" emissions, due to the regrowth of feedstock, is not supported. Trees cleared for land clearing will not grow back, future growth and carbon storage is lost and emissions from soils and processing are not counted.
- It is a false claim that burning vegetation bulldozed from agricultural lands will have a neutral effect on greenhouse gas levels. Burning vegetation releases instantaneous bursts of carbon dioxide in the air. There is no plan to replace the woody vegetation that has been cleared – resulting in a 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 emissions from biomass burning is compared to high emitting coal plants rather than wind and solar, significantly overestimating the emissions benefits.
- The lifecycle analysis of the project shows that the release of 'CFCs' 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.

3. Local impacts will worsen air quality and increase road traffic

- Biomass has negative health impacts including releasing deadly air pollution.
- Burning biomass may have more significant public health impacts than burning coal.

- The proponent's plans for sourcing fuel assumes that 42 tonne capacity B-double trucks move to and from the power station 112 times PER DAY to haul the biomass feedstock in and the resulting ash out. That is over 20,000 trips per year. There is no accounting for the impact of traffic on public roads and infrastructure.

4. Banning the use of native vegetation for electricity is a NSW Government commitment

- NSW Labor has had a longstanding commitment to close the loophole that allows the burning of any native vegetation for electricity “Labor recognises that burning timber and cleared vegetation for electricity is not carbon neutral and is neither clean or renewable energy”

5. Conclusion - better alternatives

- To reach our renewable energy goals NSW should focus on high value cleaner energy solutions like solar and wind power.
- It is a false claim that this project will be good for nature and climate.
- Burning green wood chips emits 50% more CO₂ per megawatt hour of energy produced than coal and undermines investment in genuinely clean energy.
- The proposal to burn native forests, bush, grasses and regenerated or uncleared paddocks, involves removing valuable habitat, including at-risk forest ecosystems. 850 000 tonnes of woodchips is more than the entire native forest logging industry in NSW produces. Thousands of hectares of native forests and bush within a 300km radius of the Hunter, Central Coast and North Coast risk being cleared.

For all of the above reasons, our Society opposes the proposed project.