



Dear Independent Planning Commission,

We write to express our strong opposition to the proposal to restart the Redbank Power Station using biomass sourced primarily from land clearing operations.

We are deeply concerned about our environment and climate future, and it's clear that in a carbon constrained economy, this project poses unacceptable risks to biodiversity, our climate, and public trust in environmental regulation.

The green gold rush and the push towards biomass with the label of “renewable energy” is proposed to be applied to the destruction and burning of native vegetation and provide an incentive for increasing landclearing in NSW.

The support for wood biomass relies on the idea that carbon emitted by burning biomass will be absorbed by the regrowth of vegetation that replaces the vegetation used by the industry. But in the past decade, a growing number of scientists have challenged this assumption.

The proposal relies heavily on biomass from Invasive Native Species (INS) clearing, yet the supply chains are unverified and the projected yields are unrealistic. There is no credible assessment of whether sufficient biomass can be sourced sustainably or economically. Approving this project would likely incentivise an increase in land clearing, undermining NSW’s biodiversity goals and accelerating habitat loss.

The environmental impact is profound. Eastern NSW is recognised as a global biodiversity hotspot, and further clearing of native vegetation will threaten endangered species and fragment critical ecosystems. The EIS fails to assess these off-site impacts, which are central to the project’s footprint.

Additionally, the project’s carbon accounting is misleading. Burning biomass will release over 1.3 million tonnes of CO₂ annually, yet the proposal claims “net zero” emissions by ignoring the carbon released during clearing, processing, transport and combustion. This is not a genuine renewable energy solution.

Air pollution levels in the Singleton area already exceed national air standards for healthy air. This project will only make air quality worse, harming the health of people living in the Hunter Valley.

Finally, this project lacks a social licence. There is widespread public opposition to native forest logging and land clearing. People in NSW want their forests and bushland protected, not chipped and burned for electricity.

Previous attempts have already failed in the Land and Environment Court. Verdant Technologies is attempting to profit from one of the most polluting forms of power generation. It's a dangerous proposal in terms of carbon emissions and air pollution.

The coverage regarding the wood sources is misleading. It is not just INS or invasive native species that can proliferate on previously over-cleared properties that is proposed to be combusted. It also includes plantation wood and any native vegetation that can be sourced from the region. To use plantation wood whether purpose grown or not would then put more pressure on native forests. In essence, what is planned for Redbank is any tree or native vegetation it can get.

Regardless of the definition of the type of wood to be burnt it will result in **dangerous levels of carbon emissions and other pollutants highly dangerous to human health**. Wood combustion is at least and often more polluting than fossil fuel. It has been demonstrated that the plumes from the combustion of this facility have the potential to travel down the coast of NSW affecting heavily populated regions (according to a NSW Health Department Study).

I think you will find almost any Australian scientist vehemently opposed to this proposal and that it's a mistake to continue to give such dangerous propositions air time.

Landclearing and associated habitat fragmentation is the single greatest threat to biodiversity in NSW. This proposal will provide further financial incentives for landclearing, all to feed its furnaces for electricity generation.

The forests of eastern NSW are part of one of the world's 35 biodiversity hotspots because of their exceptional species endemism and extensive habitat loss.

- There is nothing ecologically sustainable about clearing tens of thousands of hectares of native vegetation inhabited by millions of native animals in the midst of a biodiversity crisis, and converting it into carbon dioxide to worsen climate heating.
- Landclearing and associated habitat fragmentation are the single greatest threat to biodiversity in NSW, and yet most clearing is unapproved and the approval process requires no surveys to identify habitat of threatened species.
- Landclearing and logging are not in the public interest – they do not have a social licence, and do not require public consultation through a Development Application process like other developments on private land.
- Land clearing has rapidly escalated over the past decade, making NSW part of one of the world's 24 deforestation fronts.
- To supply the 850,000 tonnes of biomass required each year, will require a major increase in the rate of land clearing.
- Creating a market for large volumes of biomass will provide an economic incentive to clear land that would otherwise not have been cleared.

- They claim that most is from the clearing of Invasive Native Species (INS), which are native species which sheep and goats don't like to eat. INS provide important habitat for a multitude of wildlife, including many threatened species found nowhere else.
- Land clearing needs to stop, not expand.
- Claims that over four years 56,000 ha of biomass crops will be planted to provide 70% of feedstock have not been planned, are not credible and unlikely to eventuate.
- The current proposal does not include logging residues, though if the other sources of biomass are found to be uneconomic there is a high risk that a variation to include logging residues will be made soon after approval. Its important that IPC specifically rule out the use logging residues.
- The pretence that burning 850,000 tonnes of biomass for electricity every year will result in no emissions of CO₂, and is thus clean energy, is a nonsense.
- The power station will release over 1.3 million tonnes of CO₂ each year, with increased emissions from debris and soils at the clearing sites, and from processing and transporting woodchips.
- Burning wood for electricity is far more polluting than coal.
- We need to reduce our emissions of CO₂, not dramatically increase them as intended by this proposal
- The use of solar and wind as alternative power sources need to be considered, rather than just comparing the proposal to coal.

I urge the Department and the Independent Planning Commission to reject this proposal and instead support truly sustainable energy solutions such as wind, solar, and storage, that protect our environment and climate.

Kyogle Environment Group represents 200 members and associates.