

## Hunter Environment Lobby Inc.

202 High St East Maitland NSW 2323 2/4/2024

## Redbank Restart Power Station – Singleton LGA - Object

## Background

This submission has been prepared by Hunter Environment Lobby (HEL), a regional community organisation. Since its establishment in 1990, the group has made a significant contribution to the protection of the environment in the Hunter Region through its Hunter Regional Environmental Action Plan, public forums, submissions, and role in supporting the establishment of the Upper Hunter Air Quality Monitoring Network.

The group has had membership of NSW Government committees including Hunter River Management Committee, Mount Owen Mine Flora and Fauna Management Committee, Lower Hunter Regional Strategy Working Group, and Upper Hunter Air Quality Monitoring Network Advisory Committee, the Paterson Environmental Water Advisory Group and the present Lostock to Glennies Creek Dam Pipeline Proposal Committee.

HEL was an objector to the initial development application for Redbank Power Station made to Singleton Council on 8 November 1993. The group's submission dated 4 December 1993 raised concerns about energy and resource efficiency, cumulative air quality impacts, greenhouse gas emissions, and inadequate environmental studies for the proposal.

In September 2021, under the original DA 183/1993 HEL lodged an objection which included the following points;

'Hunter Environment Lobby objects to the amendment proposal and believes that Redbank Power Station should not be granted approval to continue to operate, either under the terms of the existing approval or the amended modification application.

The amended modification application should be refused for the following reasons:

1. The amendment is not substantially the same development that originally was proposed and approved.

2. Redbank Power Station has not operated within the terms of its development consent, including non compliance with a requirement to plant trees to offset carbon emissions, and operation above the approved generation capacity of 120 MWe.

3. The development is not a continuing use, and recommencing operations will increase greenhouse gases emitted to the atmosphere.

4. All relevant environmental impacts from the proposal cannot be considered due to lack of documentation and insufficient information about the biomass fuel source from native forests, and the fuel supply chain.

5. Known adverse environmental impacts are unacceptable, namely greenhouse gas emissions, atmospheric emissions affecting air quality and traffic impacts.

6. Due to the evolving regulatory framework for carbon emissions, the original consent was time limited to 30 years and is due to cease by 2030. It would be inappropriate to allow continuation of greenhouse gas emissions from the development without arrangements in place to transition to zero carbon emissions by 2030.

7. The development is against the public interest.'

At the present time we are again presented with yet a further application to do much of the same actions that were prohibited at the last iteration of this proposal – it seems that we are on a merry-go-round that will not stop!

And at the same time we are in a climate crisis and must look to de-carbonise the economy immediately. Whichever way you look at it, burning carbon (plants) for electricity creates CO2 (and incidentally, CH4 and N2O which are many times more destructive). In fact, it's worse than burning coal because it emits 50% more CO2 per MWh of energy produced than coal, due partly to higher moisture content.

Verdant Earth Technologies' claims of net zero Green House Gas emissions are false. Most of the sources proposed are the result of permanent loss of living carbon via land clearing, including the removal of 'so-called' invasive native species. This is not a net zero sum. The carbon from the living vegetation is burnt. Much of the feedstock will be trees many years old, potentially decades. Carbon dioxide will be released into the atmosphere, with no replacement to reabsorb it. This is a dirty, polluting proposal.

The proposal is predicated upon the pretense that burning 850,000 (wet) tonnes of wood on site to generate electricity will result in no  $CO_2$  emissions, whereas it will actually result in the release of some 1.3 million tonnes of CO2 each year. There will be additional emissions from debris and soils at the clearing sites, and from processing and transporting of woodchips.

Furthermore, Verdent is proposing to get most of its biomass initially from clearing 'invasive native species' (INS) on private land, to create more agricultural land – so there's no intention to replace that vegetation and its CO2 drawdown capacity. As you know, HEL's main issue is to protect habitat for species which would otherwise decline and become extinct.

The intent is to initially obtain at least 500,000 (dry) tonnes of feedstock each year from landclearing invasive native species, primarily in western NSW and 150 000 (dry) tonnes from clearing for infrastructure. They claim there are millions of hectares approved for clearing that have not yet been cleared. Creating this market will incentivise clearing, with at least 16,000 ha a year identified as needed.

There has been no assessment of the environmental impacts of the extensive landclearing proposed, including the loss of wildlife habitat, or the CO2 it will release. HEL sees this as unforgiveable.

NSW is a biodiversity hotspot, where human habitation is causing a biodiversity crisis. The main reason is accelerated land clearing, which is so poorly regulated that most of the flood of 'unexplained' clearings haven't been investigated. This project will further accelerate land clearing on private land.

Habitat clearing on freehold land is now the biggest cause of environmental loss in NSW, it is becoming rampant in many areas. Even 'Invasive native species' create ecosystems which provide habitats for native birds and animals. Accelerating native species clearing by creating a market for the wood will deny animals shelter, feed, and places to breed. The concept of 'invasive native species' is a contested political construct to describe regrowth of native vegetation on highly disturbed land. This regrowth is sequestering carbon and should be left in the ground, not burnt for electricity generation.

Investment in this project (whether public or private) undermines investment in genuine renewables such as solar and wind. Burning biomass for electricity is increasingly discredited overseas. In 2019, 800 scientists from across the world signed a petition condemning burning biomass for electricity. <u>https://www.pfpi.net/wp-content/uploads/2018/04/UPDATE-800-signatures\_Scientist-Letter-on-EU-Forest-Biomass.pdf</u>

The figures for projected employment created by this project appear inflated: "In total there will be 1,009.5 direct and indirect jobs created". In Alan Kohler's Opinion Piece this week in the New Daily (28.3.24) he shows that employment in fossil fuel industries is actually keeping trained tradespeople from being employed in the building industry to create housing, which is potentially a worrying development?

There are serious air quality issues with burning biomass for electricity. Air pollutants include particulates, volatile organic compounds (VOCs), methane, nitrous oxide, sulphur dioxide, lead and mercury.

There's no limit to the amount of forestry sawmill 'waste' this project can burn, making it a potentially unregulated source of forest wood. It may also burn 'construction waste' and who knows what ends up in that! We also worry about toxic medical and radioactive waste?

All the biomass needs to be trucked hundreds of kilometres in B-double trucks. At least 56 arriving (and leaving) every day. It's not clean, it's not green and it's not renewable!

The transport and associated fuel use is seriously understated. The proposal doesn't include any figures for the transport of the woody biomass from its site of origin to the chipping/storage/collection sites. These sites will also need to submit Development Applications in the respective LGAs. There is no discussion of where these sites will be located and no account taken of the time needed to prepare DAs for each site.

The fuel cost of transporting 850,000 tonnes of woody biomass to such depots will be significant and don't appear to be factored in to any of the economic, transport or greenhouse gas discussion in the document.

Yours in trust,