

Dear NSW Government

Verdant Energy are attempting to revive their Redbank biomass energy project by proposing to burn native forest from habitat clearing on private land. I am opposed because-

- Native forest biomass must be excluded as a source of renewable energy under the Renewable Energy Act. Burning cleared vegetation is not carbon neutral and the project would create a new source of greenhouse pollution. This project is an unnecessary distraction from real renewable energy solutions. It will not help, but hinder decarbonisation of the energy system.
- **Verdant Technologies plans to use native forest biomass on private land as a fuel source. Wood biomass emits up to 50 per cent more carbon dioxide (CO<sub>2</sub>) than coal when burnt, yet carbon accounting classes it as zero carbon in the energy sector, as trees are assumed to re-absorb the CO<sub>2</sub> “when they grow back.”**

This is false thinking when trees take decades to grow, but the carbon emissions are immediate. Adding this phrase “when they grow back” is wrong and disingenuous.

This carbon accounting that industry uses is contested by scientists as carbon absorption through the regrowth of forests which lags combustion, results in a "carbon debt". If a 100-year-old tree is felled it will take 100 years for a replacement to take up and store an equivalent volume of carbon.

**If the original (mature) tree had been left to grow it would have continued to absorb additional carbon from the atmosphere.** Makes perfect sense! We are not comparing ‘like for like’ when instantaneous destruction by logging causes increased carbon emissions immediately; compared to regrowth of mature trees taking decades to be anywhere close to being carbon capturers again. Burning forest biomass *adds to greenhouse gas emissions* at a critical point where we need to be reducing them, while also depleting the capacity of those forests to continue drawing down carbon from the atmosphere. Even if this proposal uses cleared habitat and forest biomass from land that has been stripped for farming, there will be no regrowth, meaning there will be no future carbon sequestration to theoretically reduce the power plant's immediate emissions. The immediate emissions will be added to the atmosphere immediately when we should be reducing emissions.

- Therefore, any form of native forest wood, including so called ‘wood waste’, must be prohibited as a source of renewable energy, as it is NOT renewable energy. Logging and burning native forests wherever they are located emit large quantities of greenhouse gas. ‘Wood waste’ is a misnomer, as whole trees can be burnt. *The biomass industry likes to focus on wood waste to appear to the public they are merely burning waste to produce electricity to elicit community confidence, trust, and support in the industry.* This is deceitful and Verdant Energy cannot and should not be trusted.
- Environmental groups and the public have raised concerns that the harvesting of native forest biomass would adversely impact the habitat of native wildlife. Protecting our native forests holds approximately 80% of our biodiversity. ***Protecting our forests now on public and private land from biomass burning will provide the additional benefit of acting on Australia’s woeful record of extinction and biodiversity loss.*** More than 1,400 forest-dwelling plants and animals are listed as threatened species under Australian law. **Since the devastating bushfires of 2019/20, it is even more critical that NSW especially who were worst hit by these fires, allow native forests on private land to recover and not be burnt for electricity.**
- The combustion of biomass releases toxic air pollution including fine particulates (PM<sub>2.5</sub>) and nitrogen oxides. These pollutants cause premature mortality, respiratory and cardiovascular

disease, as well as low birth weight. Nearby communities will suffer the impacts of this source of pollution plus added air pollution from increased truck movements that will be needed to deliver fuel to Redbank Power Station. The government is encouraged and has a moral responsibility to protect people's health especially those in the immediate Singleton and Newcastle regions. Biomass has negative and unjust health impacts including releasing dangerous air pollution and Verdant Energy must reveal the full implication of this especially to the local communities.

- *Prioritising biomass industry will displace genuine renewable energy sources such as wind and solar which will have a serious flow on affect that could stall the development of these industries that must be developed further. NSW will be known as a climate laggard.* Through the biomass industry our native forests on private land may be decimated, and all in the name of so-called 'renewable energy' which it is not. Australians will no longer be able to trust that 'renewable energy' means environmentally friendly. Tagging it as 'renewable' is a lie.
- The proposal seeks to exploit NSW land management rules that are unequivocally failing nature and that are currently under review.
- We must not allow a biomass industry to compound the impacts of exported wood chipping. Wood chipping from destruction of our forests is also wrong when it is exported to other countries to create their energy. Wilderness Australia has expressed concern that "by providing a market for trees that would otherwise have no commercial value... wood bioenergy will inevitably lead to an intensification of logging of native forests." More environmental damage and biodiversity loss will result.
- The NSW government's management of public assets including our state forests is one of vast destruction and multiple breaches by Forestry Corp especially regarding koala feed trees being destroyed leaving koalas if not killed in the process, homeless and vulnerable. One fifth of koala populations live in native forests currently being bulldozed on private land or by NSW Forestry Corp who bulldoze public native forests. NSWFC has incurred multiple prosecutions against them. Forestry Corporation has been fined because of illegally cutting down protected trees. Approving the biomass industry to cut down more trees on private land will spark a further onslaught of destruction of native forests and the mass loss of native wildlife. **With this background the community question whether the State Forest regulator should have the responsibility to ensure unbiased compliance of the biomass industry which they support when they have been negligent and broken the law themselves?** Australia is one of the world's deforestation hotspots. Between the year 2000 and 2017, Australia cleared over 7.7 million hectares of threatened species habitat across the country. We need to protect and restore our environment, yet here we are again approving more destructive projects that destroy nature.
- Let's not forget that over 1000 **native** plants and animals are currently at risk of extinction in NSW. On the EPA NSW State of Environment website, it says 1043 species are listed as threatened in NSW as of December 2020 with 116 critically endangered species in NSW who also face an extremely 'high risk of extinction' in the immediate future. The new proposed fuel source for Redbank power station will create a market to destroy even more native wildlife habitat meaning an increased decline of our animals. The number of species at risk of extinction continues to rise. 115 ecological communities are listed as threatened under NSW legislation including 78 species declared extinct. For the NSW government to even consider approving the burning of native forest from habitat cleared on private land is absolutely reckless.

I am therefore strongly opposed to the revival of the Redbank biomass energy project.

Martin Derby