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11th April 2024

Dear NSW Government,

**Re: Objection to the [Restart of Redbank Power Station SSD-5628496](#)**

The Sydney Basin Koala Network strongly opposes the proposed restart of the Redbank Power Station due to significant concerns regarding its impact on koala populations, habitat destruction, and its broader contribution to climate change.

**Climate Change Impact**

The debunking of biomass as a green energy solution is well-documented, with over [784 scientists](#) addressing the EU in 2018, and another [500+ scientist reaching out to global leaders](#) in 2021, highlighting the problematic nature of biomass burning regardless of the sustainability of the sourcing practices.

Briefly, the carbon-neutrality of burning biomass for energy is fundamentally flawed because it is based on re-growth of vegetation in the future absorbing the carbon emitted today, which disregards the significant 'Carbon Payback' period. During this time, the atmosphere endures elevated levels of carbon, exacerbating the effects of climate change; more intense bushfires and heatwaves, which are already a serious threat to koalas, and causing long-term ecological damage. Even more concerning, much of the proposed **biomass for this project is sourced from areas designated for clearing, negating any potential for "regrowth" and contributing to a net increase in atmospheric carbon.** Greenlighting this proposal will undermine a transition towards genuinely green energy sources.

**Risks to Biodiversity and Koala Habitat**

Loss of habitat is the number one threat to Koalas, which are in decline across the Sydney Basin. The [NSW Koala Strategy](#) acknowledges the need to increase koala habitat, with a 2050 target of 100,000 additional hectares. Continuation of habitat clearing undermines this target. **Halting habitat clearing is essential to prevent further declines in koala numbers.** However the Local Land Services Act is failing to protect koala habitat on private land. Self-assessable clearing is permissible with little transparency, accountability or oversight.

It is therefore of serious concern that Native Forest Cleared under the LLS Act 2013 and Forestry Act 2012 would be legal sources of bio-material for this power station, when [Koalas are already losing habitat to such Code Based Clearing](#).

[Appendix M - Fuel Supply Characteristic Study](#) states "The bio-material as specifically permitted and defined under clauses 138 to 140 would be a legal source of native forest bio-material for use as feedstock fuel at the Facility." - page 23.

These legal (but immoral) sources include:

- Trees cleared under Part 5A of the LLS Act 2013 and
- Trees cleared for thinning in accordance with the Private Native Forest plan or under Part 5B of the Forestry Act 2012.

Such code based clearing has been largely responsible for the tripling of habitat clearing since 2016 and although the proponent says they will not seek to use these legal forms of native bio-material, once operational there would be nothing to prevent it. This leaves us extremely worried that, **if approved, the right to burn cleared native forests for energy will create a market to destroy even more native forest and see an increase in clearing of koala habitat.** Instead we must prioritise protection of all remaining koala habitat alongside restoration.

### **The Inseparable Link Between Climate Change and Biodiversity**

The destruction of native forests for biomass not only fails to mitigate climate change but also significantly harms biodiversity. Clearing vegetation for biomass fuel erodes stable, long-term carbon stores in vegetation and soil, with many ecosystems unable to recover fully due to intensified fire activity and ecosystem collapse. **The proposed project overlooks the intrinsic link between climate action and biodiversity preservation, proposing a solution that damages both.**

### **Conclusion**

This proposal, which incentivises cutting down native forests for power generation, directly contradicts the urgent need for environmental responsibility and conservation. It undermines efforts to combat climate change and biodiversity loss. Sourcing Bio-material from across the Sydney Basin, would threaten Koalas and other threatened species in this region through habitat destruction, contributing to their decline and endangering their survival.

Given the substantial evidence of the proposal's adverse environmental impacts, particularly on climate change and koala habitats, the Sydney Basin Koala Network strongly recommends that the consent authority reject the application for the Redbank Power Station's restart. We urge a reconsideration of energy production methods towards truly sustainable and environmentally responsible solutions that prioritise the preservation of biodiversity and the fight against climate change.

Thank you for taking the time to consider these points.

Yours sincerely,

Jade

Jade Peace

[Sydney Basin Koala Network](#)

