



forestecologyalliance@gmail.com

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### **Forest Ecology Alliance Submission**

Re: Proposed restart of the Redbank Power Station using waste wood residues (excluding native forestry residues from logging) for energy production

Forest Ecology Alliance (FEA) members are grateful for the opportunity to object to the proposal to use biomass to generate electricity at Redbank Power Station.

**We strongly oppose native forest wood burning to create electricity.**

**We acknowledge that the proposal is to exclude native forestry residues from logging. We are aware that wood waste residues will instead be procured from land clearing and that this will often involve the destruction of native forest and habitat vegetation.**

**Burning native forest wood does not prioritise environmental integrity and protection. Deforestation is counter-productive to a crucial need for climate change action. Many countries have recently decimated their native forests to produce biomass for energy. Australian tall tree forests are now even more necessary to sequester carbon and help maintain healthy biodiversity around the planet.**

Forest Ecology Alliance (FEA) is an environmental organisation based on the Mid North Coast of New South Wales. Group members are ecologists, botanists, citizen scientists and residents who work towards the conservation of native forests and waterways.

FEA members primarily conduct field studies in local forests, co-ordinate citizen science ecological surveys, compile data and produce reports. FEA lobby, make recommendations and negotiate with various organisations and stakeholders (eg. Forestry Corporation of NSW and NSW Environment Protection Authority). We are all volunteers.

Most FEA members live in the Mid North Coast in Nambucca Valley, Kempsey, Bellingen and Coffs Harbour Local Government Areas.

Unfortunately, we are watching the unique and diverse forests of our region being destroyed at an ever-increasing rate. FEA members spend several days per week

conducting field studies within local forests. We appreciate the beauty and wonder of these forests. Yet we have sadly documented rapid escalation of environmental degradation and species decline.

We are also highly aware of the impact of decreased environmental protection regulations that have enabled bodies such as Forestry Corporation of NSW, RTA, private land holders and housing estate developers to clear fell forests beyond any hope of restoration or regeneration.

There is no doubt that many of our publicly owned and private forests are now not only providing sawlogs to timber mills. Many local forests have been clear felled, destroyed or significantly impacted to supply native wood “residue” to at least one biomass fuelled power plant, owned by Cape Byron Company in Broadwater, NSW.

Many Forestry Corporation of NSW Harvest Operation Plans refer to yield “residue” in State Forests in our local area, including Wild Cattle Creek, Tuckers Nob, Collombatti, Orara East, Moonpar, Newry and Boambee. Many Harvest Plans also list Low Quality (Salvage) and Low Quality Sawlogs (Grades 1 & 2) in Expected Yield Tables in State Forests such as Ellis, Sheas Nob, Clouds Creek, Conglomerate, Bagawa, Styx River, Thumb Creek and Tamban.

With so little Forestry Corporation of NSW public accountability, as noted repeatedly in the NSW Parliamentary Inquiry into the Long-Term Sustainability and Future of the Timber and Forest Products Industry, we are in no way assured that residue from native forest logging, of this grade and indeed of any grade, will not end up in bioenergy production plants, such as the proposed Redbank plant, to be converted into biomass.

Of the forests listed above, most are listed as Native Forests but some are defined as plantations. In this area of the Mid North Coast hardwood plantations often also contain large proportions of regrowth or remnant native forest. Thus, if truckloads of plantation timber residue are to be sent to Redbank Power Plant for biomass production they will undoubtedly also contain native forest residue.

In addition, Forestry Corporation of NSW definitions of native forest are problematic. In his September 2022 desktop review, “Converting Native Forests to Plantations”, Dailan Pugh of the North East Forest Alliance points to the now common practice of native forest conversion to plantations:

“By 2014 the boundaries of their claimed plantations on State forests had been expanded and other areas added, claiming at least another 2,000 ha of native forest not previously identified as plantations, while dropping claims for 2,000 ha of those previously identified presumably because they couldn’t be justified. In 2018 the rebranded Forestry Corporation was claiming 39,400 ha as hardwood plantations of

various types, including 1,900 ha labelled as “failed”. Many of these were on purchased properties.

Currently, some 36,500 ha has been authorised as hardwood plantations by the Department of Primary Industries (DPI), delivering a further windfall, with some 4,700 ha authorised even though it has not been identified as plantation, including over 3,000 ha identified as native vegetation. It is unfathomable as to why the DPI included non-plantations, particularly as the majority of their canopies were clearly not formed by planted trees, or at the least, why they didn’t identify the native vegetation as ‘retained’ vegetation.”

FEA are aware that there have been court challenges concerning the proposed establishment of Redbank Power Station. That public opposition has remained steadfastly focussed indicates how concerned many Australians are that we do not follow the lead of many companies overseas who have converted or continued to use power stations for biomass power production. Simply, we cannot sustain mega plants in need of a constant source of wood supply.

In 2021 Australia was one of 141 signatories to the Glasgow Leaders’ Declaration on Forests and Land Use. If we are to ‘halt and reverse’ deforestation by 2030 and “Reaffirm our respective commitments to sustainable land use, and to the conservation, protection, sustainable management and restoration of forests, and other terrestrial ecosystems” we must put a stop to the unbridled land clearing that has been occurring in NSW in recent years. <https://ukcop26.org/glasgow-leaders-declaration-on-forests-and-land-use/>

## **CONCLUSION**

### **How soon is now? Australia could put an end to deforestation earlier than 2030.**

Here on the Mid North Coast of NSW hundreds of thousands of hectares of publicly owned forests between Grafton and Taree have been scheduled for clear felling. In the proposed Great Koala National Park area, many prime habitat forests are targeted to fall in the next few months and many more within twelve months.

The natural environment of our region has been radically transformed in recent years due to climate change induced extreme weather events. Soil erosion silts our waterways following the devastating wildfires on 2019-20 and unprecedented floods of 2021-22-23. Our shoreline is changing fast.

It is challenging then for locals to accept that federal and state government decisions can steer further human induced destruction. Large-scale property developers have taken advantage of drastically reduced environmental and wildlife protection regulations to clear massive swathes of bushland. Virtually unregulated Private Native Forestry codes have enabled property owners to remove prime koala habitat and other significant wildlife refuges. Forestry Corporation of NSW (FCNSW) have been allowed to increase their harvest operations like never before and are increasingly breaching even their own inadequate guidelines.

Land clearing will undoubtedly significantly escalate if Redbank Power Station is operational. Conservationists and many concerned citizens are already shocked to see our rapidly changing landscapes, particularly in coastal areas. Habitat fragmentation has emerged as a major contributor to escalating biodiversity loss and species decline.

Around the globe, many countries have been burning forests and converting them to carbon dioxide, thereby directly contributing to global warming and ecosystem collapse. Most are now realising the consequences of their decision to burn forests for fuel and regretting their irreplaceable environmental losses. How can Australians possibly propose to follow to make the same mistakes?

To grant permission for Verdant Earth Technologies Limited to begin searching throughout NSW for native vegetation to continually feed Redbank Power Station places us firmly on a road to environmental disaster in a time when most people are expecting that we instead start to set in place projects that will ensure a truly sustainable future for us all.

We fully support the recommendations presented by Professor Graeme Samuel (October 2020) in his Independent Review of the Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act).

The review found that, “Australia’s natural environment and iconic places are in an overall state of decline and are under increasing threat”. He refers to the obvious fact that our laws are “not fit to address current or future environmental challenges”.

Professor Samuels concluded that we face a very real extinction crisis unless we act immediately. He states that, “The current environmental trajectory is unsustainable” and refers to the need to introduce strong environmental protection standards backed up with independent oversight and increased public accountability.

On July 19 2022, Minister Plibersek released the national State of the Environment Report and the contents were as shocking as the 2021 NSW State of the Environment Report. Though it was then clear that we must now act decisively, to reverse and attempt to repair the environmental neglect and the irresponsibility of previous government policies and practices, insignificant action has occurred to date in this direction.

Following the 2021 global climate summit COP26 the UK’s official climate advisor Nigel Topping spoke of the urgent need for countries to speed up transition towards cutting emissions when he said, “The question is, do we have the political will to do it fast enough given the very limited time we’ve got left?” <https://www.bbc.com/news/av/science-environment-58748135>

A clear way forward is possible for Australia to set new world standards regarding sustainable power production. We call for all concerned to respect the extensive and indisputable scientific evidence that Australia needs now to commit to remove any possibility of native forest wood eligibility for biomass fuel production.

## References

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Prof. Graeme Samuel AC (2020) Final Report of the Independent Review of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)

**We acknowledge the Gumbaynggirr Nation, custodians of this Country and their connections to land, sea and community.**

**We pay respect to their Elders past, present and emerging.  
We extend that respect to all Aboriginal and Torres Strait Islander peoples.**