



11 April 2024

Hunter Branch  
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Attn: Joe Fittell  
Major Projects  
Department of Planning

Lodged via planning portal:  
<https://www.planningportal.nsw.gov.au/major-projects>

Dear Mr Fittell

## REDBANK POWER STATION : SSD-56284960

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The National Parks Association of NSW (NPA) strongly objects to the proposal to reactivate the (so-called) Redbank Power Station ('Redbank') using non-forestry sourced biomass as a fuel stock. We also objected to earlier applications relating to Redbank made in June and September 2021.

NPA's mission is protecting nature through community action. Our strengths include State-wide reach, deep local knowledge, evidence-based input to policy and planning, and over 65 years' commitment to advancing the NSW protected area network and its professional management. We also provide outstanding opportunities to experience and learn about nature through our unrivalled program of bushwalking, field surveys, bush regeneration and other outdoor activities.

Our opposition to the proposal is based on two key considerations:

- burning biomass otherwise available for carbon storage is inconsistent with undertaking urgent action to reduce carbon emissions
- the proposal would have significant adverse environmental impacts on the Hunter and adjoining Mid North Coast region, particularly in relation to biosecurity and truck movements.

### Modification or fresh application?

There is substantial uncertainty as to the exact nature of the approval being sought. The EIS seeks approval to:

1. "Restart" Redbank as a power station.
2. Change the fuel source from a mixture of coal tailings and run-of-mine coal to "biomass (excluding native forestry residues from logging)".

The proponent is seeking to retain existing conditions of development consent (first granted in 1994 and amended in 1997), while surrendering existing development rights to operate Redbank using coal tailings and run-of-mine coal.

We submit that the proposed development is more correctly described as being *to establish a power station* that would run on biomass etc. This is because the existing Redbank development was not developed or used primarily for the purpose of generating electricity, but rather as a coal waste disposal facility. This fact was acknowledged in the Land and Environment Court judgement that granted the



original consent [Greenpeace Australia Ltd v. Redbank Power Co. Pty Ltd NSWLEC 178 /1994], which noted the following statement in evidence at page 6:

Redbank's "primary mission" is not the production of power, but the utilisation of tailing in order to reduce its environmental consequences and to recover energy value lost in discarded tailing.

The current proposal involves using the existing facility for an entirely different purpose. For this reason, it would therefore be incorrect to deal with the application as if it were a modification of consent, when it is actually a new development. The application and any conditions should be determined *de novo*, based on circumstances as prevailing now, not those that operated in 1994. Were any approval to be granted, the existing consent should be surrendered in total.

The proposal is dependent on obtaining various other approvals, including EPA licences for combusting certain fuels. It is unclear whether such approvals would in fact be forthcoming. Approval should not be granted unless there is reasonable certainty on the matter, as would be required if the proposal were 'integrated development' under the EP&A Act.

### Supply movements

The original consent provided for coal waste to be supplied by a slurry pipeline from the nearby Warkworth mine (later changed to conveyor belt). In contrast, the proposal involves transporting biomass from a 300+ km supply zone with a fleet of at least 56 trucks. Operations are to be continuous 365 days per year, with maximum trip generation of one truck movement every 4-5 minutes. This represents a substantial impact on the amenity and capacity of the regional road network, yet is not considered in any detail by the EIS.

### Biosecurity

The movement of substantial volumes of biomass raises major biosecurity issues. This is particularly so since much of transported material is actually intended to be listed weed species. The Biosecurity Management Plan set out in Appendix Z of the EIS addresses certain national issues, but ignores relevant plans and requirements applicable to the proposed region of operation within 300+ km of Singleton. For example, the EIS does not address the general biosecurity duty to prevent movement of weeds under the *Hunter Regional Strategic Weed Management Plan*. This is a major omission.

The practical reality, however, is that any conditions that might be imposed in this regard are unlikely to be adequately complied with due to a lax compliance culture in the transport industry as well as insufficient enforcement of compliance by regulators. Together this represents a significant risk to the region's agricultural and ecological systems.

### Sufficiency of biomass supply

One of our principal concerns is that the project represents an initial step towards opening up Hunter and North Coast forests for the general extraction of native forest bio-materials. While the proposal is stated as excluding forestry-sourced biomass, there is inadequate information presented in the EIS to demonstrate whether the required quantity of material is actually available within the 300 km supply zone.

Should the proposal be approved, a foreseeable eventuality is that the proposed biomass sources would prove insufficient to run Redbank at anything near its design capacity. The proponent could then be expected to seek approval to source biomass from forestry sources, this being the only supply source that could conceivably provide sufficient volume and supply security to run a power station.

### Carbon emissions

Our other principal concern with the proposal relates to its contribution to carbon emissions. In our view the case for biomass as a carbon neutral energy source is fundamentally flawed. We note that:

- biomass is an inefficient fuel that generates up to 50% more carbon emissions than coal

- claims that biomass is a carbon neutral energy source does not take into account the significant time lag (decades to centuries) between the release of carbon during harvesting, transport and combustion, and its eventual recapture
- combustion of biomass (such as from agricultural land) foregoes the opportunity to sequester the carbon content on-site within soils and vegetation, completely contradicting the case for harvesting the biomass as an energy source
- the proposal is being made at a time when there is unprecedented international consensus for urgent action to reduce emissions
- achieving carbon neutrality by 2050 requires substantial action to be undertaken within the present decade, calling into question all proposals for new emission sources
- the proposal is contrary to the intent of the *NSW Electricity Infrastructure Roadmap*.

A major omission from the EIS is a comprehensive carbon emission balance. Those calculations which are provided by the EIS do not include those resulting from sourcing and transporting biomass, such as indirect emissions from vegetation clearing and the operation of a substantial truck fleet. For example, transporting 850,000 tonnes of biomass per annum over an average distance of 150 km would require a total transport effort of approximately 125 Mt km (not counting return journeys). The claim by the proponent that burning biomass is carbon neutral is doubtful, since all scope 1, 2 and 3 emissions that would be associated with operating Redbank have not been considered.

The issue of greenhouse emissions received considerable attention in the original 1994 approval by the Land and Environment Court. National and international concern about the 'enhanced greenhouse effect' was noted, but at that stage there was insufficient scientific certainty. Over the ensuing 30 years the level of certainty has progressively increased. In its most recent report the IPCC has declared the role of human influence in global warming to be 'unequivocal', and that urgent action is required to limit emissions.

### Life of the consent

The existing consent limits the operation of Redbank to a maximum of 30 years. Section 1.9 of the EIS seeks to remove this condition. The time limitation was originally imposed in 1994 to cap total greenhouse gas emissions. Our view is that this condition is much more relevant now than it was 30 years ago, due to the urgency for action to achieve net zero emissions. The condition should be retained. Redbank is a product of its times, but no longer meets present day needs or expectations. It has already reached its use-by date, and any operation beyond 2030 would be completely at odds with the present strategic context.

### Carbon offsets

The Redbank development consent includes a condition requiring tree planting, the purpose of which was intended to mitigate the effect of greenhouse gas emissions. It is unclear whether this condition was ever complied with, and we request that the matter be further examined.

The condition should be reviewed in the event of a decision to allow the proposal to proceed. The 1994 requirements are likely to have been fairly tokenistic in nature, as carbon emissions were still a fairly novel issue at that date. The quantum of carbon offsets should be calculated in accordance with current day methodologies.

### Conclusion

We strongly question whether the proposal would generate any net benefit to the community, noting that there are likely to be a variety of significant adverse consequences, none of which have received any substantive consideration. Major uncertainties relate to:

- net energy budget (after considering transport energy inputs)
- net carbon budget (after considering transport emissions and forgone carbon storage)

- trucking impacts
- biosecurity risks
- consistency with public policy promoting urgent progress towards carbon neutrality.

This proposal is not in the public interest, and should be refused.

Yours sincerely



Ian Donovan

**President, Hunter Branch**  
**National Parks Association of NSW**  
*protecting nature through community action*