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**Nature Conservation Council of NSW comments on the *‘Scoping Report and SEARs Application Restart of Redbank Power Station and Use of Biomass (excluding native forestry residues from logging) as a Fuel, Verdant Earth Technologies Limited’*.**

The Nature Conservation Council of New South Wales (NCC) is the state’s peak environment organisation. We represent over 180 environment groups across NSW. Together we are dedicated to protecting and conserving the wildlife, landscapes and natural resources of NSW.

The removal of ‘native forestry residues from logging’ as a fuel, is a welcome amendment to Verdant Earth Technologies proposal for Redbank Power Station. However, NCC still has a number of concerns with the project, and request that the issues below are included in the Environmental Impact Statement (EIS) for this project.

**Recommended inclusions for the EIS**

- That the proponent provides more detailed plans regarding exactly where the fuel will be sourced, including:
  - figures of fuel and likely locations it will be sourced from, including breakdown by source of fuel,
  - key regions targeted by Verdant for biomass recovery and harvesting, including max distance fuel will travel to reach the power station,
  - size (tonnage and hectareage) of referenced dedicated plantations that will provide fuel to the power station,
  - any predicted/potential land use conflicts that could arise from land required to generate fuel for Redbank.
- That the proponent commission an independent assessment of the upstream ecological impacts of the power station based on the detailed fuel sourcing plans focusing particularly on;
  - The potential for this project to incentivise (by providing a market) and driving up land clearing of native vegetation in NSW and,



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- the risk of intensification of logging in native forests through use of residues for biomass from sawmills.
- NCC disagrees that the greenhouse gas assessment should be considered of 'low' priority, rather, and disagrees with the assumption that biomass electricity is a real zero emissions energy. Subsequently, it should be afforded a 'high' priority in the EIS, especially given the purpose of this project is to be a 'green' energy replacement during the transition to net-zero. Therefore, we seek;
  - The proponent undertakes a thorough climate impact assessment of this project using a methodology that accounts for the scope 1, 2 and 3 emissions likely to generated per annum and through the life of this project.
- Environmental assessment into ash storage and potential impact on waterways and environment.
- Thorough air quality assessment that investigates impact of pollution generated from the operation of the power plant using biomass, as well as emissions generated from the daily truck movements required to transport the delivery of fuel to the plant.
- Detailed economic analysis of cost of re-opening and running the power station on biomass, as well as any predicted subsidies or revenue from either the NSW Government or Federal Government.

Thank you for the opportunity to participate in the consultation.

Your key contact point for further questions and correspondence is Wilson Harris, Forest Campaigner, available via [wharris@nature.org.au](mailto:wharris@nature.org.au) and 0479 100 461. We welcome further conversation on this matter.

Yours sincerely,

**Jacqui Mumford**  
**Chief Executive Officer**  
**Nature Conservation Council**