

Canopy Native Forest Committee  
Total Environment Centre of NSW  
Level 4, 78 Liverpool Street  
Sydney NSW 2000

Environmental Planning Officer  
Infrastructure Projects  
Department of Planning  
GPO Box 39  
Sydney NSW 2001

### **Submission on the proposed Eden Biomass-Fired Power Station**

Dear Sir/Madam

Thank you for the opportunity to make a submission on this important matter.

I am writing on behalf of the Canopy Native Forest Committee of the Total Environment Centre of NSW, a voluntary organisation concerned with the protection of our native forests and wildlife from damaging and inappropriate activities.

This Committee wishes to express its strong opposition to the current proposal as it is expected to have numerous adverse environmental impacts.

The environmental assessment report is a travesty that fails to take into account the ecological and climate change impacts of the process of supplying biomass fuel to the proposed power station and plays down the issues of aerial and aquatic emissions from the plant.

The section on terrestrial ecology confines itself to the narrow issue of the impacts of developing the site of the power plant.

Any discussion of the logging operations that will supply the fuel for this project ends with unsubstantiated references to such activities being sustainable and renewable simply because they are certified under the Australian Forestry Standard. It must be pointed out that this forestry standard lacks any credibility with environmental organisations or independent experts.

Canopy has consistently opposed the native forest logging activity in this region that has primarily supplied woodchips and will provide most of the resource for the proposed plant. For decades the excessive intensity and extent of this activity has removed old growth forests, reduced threatened flora and fauna populations, degraded numerous ecosystems, lowered water quality and quantity, caused soil erosion and added significantly to greenhouse gas emissions in the South Coast

and Eden regions. There is currently considerable controversy concerning logging operations in koala habitat in Mumbulla State Forest near one of the last viable koala colonies in the region. The great majority of the timber produced by these operations is destined for the proponent's woodchip mill.

Canopy's key concern is that the proposed power plant, along with the current woodchip mill, will underpin this ecologically unsustainable logging for many years and possibly lead to the future expansion of this activity.

The proponent is clearly seeking to entrench its access to the native forest timber resource by realizing another economic use for it in addition to export woodchipping. There is an uncertain future for the mill's export woodchip markets given recent economic turmoil in Asia, increasing competition from other suppliers and the growing demand for certified timber from plantations. If this biomass power station is accepted as a renewable energy source it will also attract federal subsidies and possibly increased demand for its product.

This Committee contends that logging activity should be phased out of these native forests altogether and any export woodchips and other timber products supplied by plantations. The so called waste that will supply the proposed power plant would not exist if it were not generated by destructive and unnecessary logging activity in the first place.

The environmental assessment report claims that the biomass fuel will compare favourably with coal with regard to greenhouse gas emissions generated during burning.

However, the report fails to take into account the most recent scientific research into the carbon storage qualities of native forests conducted by the Australian National University (Green Carbon – the role of natural forests in carbon storage – Mackey). This report underlines the importance of protecting native forests as part of the solution to climate change and the contribution of native forest logging to greenhouse gas emissions.

If the logging activities that will supply the fuel are taken into account, the overall greenhouse gas emissions of the biomass power station will be much greater, possibly as much as six times that of an equivalent coal fired power plant.

Moreover, it is unfair to compare the greenhouse gas emissions of this proposal with coal projects when it is being presented as a renewable energy source. It should instead be compared with the emissions from genuinely renewable energy sources of an equivalent scale such as solar, wind, geothermal and tidal projects. The latter can be expected to generate much lower emissions. Canopy is concerned that if this particular biofuel is accepted as a renewable energy source under the federal government's mandatory renewable energy target scheme the power plant will compete successfully with low emission

renewable energy projects for market share. This could occur due to the size and relative cheapness of its guaranteed potential resource from subsidized logging operations on publicly owned land. This will defeat the purpose of encouraging renewable energy, which is of course to reduce national greenhouse gas emissions.

For these reasons, Canopy calls on the government to totally reject the proposed power station.

Yours faithfully

Graham Daly  
Chairperson  
22/04/10