

SEFE Environment Assessment

Biomass-Fired Power Station Major Project Application 09_0034

22 April 2010

At what cost?

In whose interests?

Is “dead koala” power renewable or a DEAD LOSS?

As this proposed wood fired electricity station could not go ahead without Renewable Energy Certificates (REC) on top of subsidies from loss making native forest royalties and “restructuring” payments, with the Australian forestry industry on its knees, begging for ever more handouts, this is the time for restructuring to get out of virtually all native forests and move to Industries’ preferred and plentiful plantation timber. Nippon Paper can then make market based investment decisions rather than relying on more government subsidies via REC.

This proposal should be rejected forthwith.

I live on the south coast and see hundreds of trucks every day, taking logs to the Eden chip mill. A million tonnes of woodchips every year from hundreds of thousands of trees from forests virtually clear felled, then burnt, with soils left compacted, soil carbon destroyed and downstream siltation wrecking estuaries.

I belong to national and regional conservation alliances whose main concern is native forests as essential solutions for climate change, water and biodiversity, natural forests in healthy landscapes.

We research and present material to the public, politicians and the media about the impact of current logging practices in south eastern Australia.

I am an artist, schooled in observation; however I am not the only one to see the degraded quality of logged forests, hear or don’t hear the sounds of once common species such as koalas, owls and gliders now threatened with regional extinction. This plus ongoing drought conditions which are drying out vegetation with the very rare rain event of up to 18” with devastating effect on exposed soils and downstream industries – the environment cannot take any more human trashing. No amount of subsidies for a supposedly “renewable” power source will make it okay to keep woodchipping the southeast forests.

The politics – in whose interest is the proposed wood fired power plant?

Which “tribes” and vested interests such as: CMFEU, TCA and NAFI not to mention forestry departments and politicians? Certainly not the general public

who, when polled, overwhelmingly want native forest logging to stop, especially woodchipping.

Electricity retailers, call power from native forests, “Dead Koala Power”.

No one wants to give up territory yet as resources are depleted by greed and ignorance, industries die or move to more sustainable ways. Fishing is a prime example. Exit packages may be necessary.

The economics – with native forest chip log royalties half what they were ten years ago, with yields down and 70% more area need for the same quantities, with growth rates lower and dieback, with the market preferring plantation timber, with increased competition from countries with better rain falls and soils, closer to the Asian markets nothing will save the industry, certainly not China and India.

NSW government needs to examine the pressures to continue selling chip logs at a loss especially when the quality and quantity is falling. This is a public asset to be cared for, its character retained, not destroyed for three hundred jobs, especially when similar ones are available in plantations and mining.

Subsidies – this current version of a forest industry lives off tax payer subsidies; the Ken Henry report on taxation will examine the efficacy of subsidies. Removing the current State subsidies from below production cost royalties of a ‘free’ publically owned asset where costs are not included such as: rates and roads and taxes, would bring the supply of native forest chip logs to a halt as prices went to the \$22 +per tonne and the market moved to preferred plantations suited to modern machinery,

Supply chain – ignoring this leaves the government vulnerable to future requests for financial bailouts and changes in rules governing native forests as industries threaten to sack workers when supplies dry up in a few years.

Insurance costs will rise from hotter, drier more fire prone regrowth forests especially those located near tourist villages.

New industries will be needed for a low carbon future such as: carbon credits, water supplies, research, education, with Tourism ten times the earner of logging and Australia’s unique flora and fauna cited as reasons for international visitations, especially koalas by the Japanese, with down stream industries such as fine regional foods, oysters and from Bermagui to Eden, tourism campaigns such as the Australian Coastal Wilderness Landscape, the world’s most accessible temperate forests. The way forward – whole of landscape planning, integrating and connecting farmlands, and eco- systems for a healthy sustainable future is long overdue.

The beauty – the sacredness of nature that is: seeing the whole, how the parts fit together into a resilient, vital state is important to us all; especially to the first Australians and their connection with the land. The dreaming, the song lines and the wealth of knowledge in danger of being lost forever – the pity is the first people have asked for the lands of Gulaga and Mumbulla Mountains and been ignored and even sold out by a few with some other inducement or lack of

knowledge. Now they are being logged with 95% ending up as woodchip. Saw logs and woodchip logs are very poor quality. -

Resilience - the diversity of the ecology of this land is beyond imagination yet we are in danger of turning our forests into mono crops, simplistic and therefore vulnerable to changes in climate. The bio-diversity of forests is their greatest asset yet we are losing species at one of the fastest rates in global history – why? Because we fail to recognise the value and complexity of intact forests for habitat, as well as value them for: oxygen, rain, water, carbon sinks and for research into as yet unknown organisms we may explore for future.

The Water – Melbourne Water, once the Victorian Board of Works has research showing logging forests decreases water supplies by up to 40%; this research applies to NSW forest types. And the supply to catchments is year round as water is slowly released including during the dry season. This is particularly relevant in Yarramie, slated for logging this year, where the locals run their own water supplies even through droughts.

Regional Forest Agreements – these are flawed contracts as they fail to take into account climate change and water and because the EPBC act no longer applies. State protection is desk based, Reviews are overdue, breeches are ignored and fines are not imposed. . Log supplies are insufficient to cover another ten years – now is the time to admit this lack of supply rather than wait until ever coupe is logged in spite its value and in spite the poor quality of the logs, such as those coming out of Mumbulla State Forests at present.

Native forest logging is not economic; and woodchip royalties have probably never covered costs and now are losing money with the excuse of maintaining jobs – yet employment is available in plantations and mining. Minister Macdonald gave this excuse to Parliament as over seas workers were brought in to cover truck-driving shortages.

Manufacturing “waste” – there is a market for fines from native forests therefore it is not waste; other uses can be found for the tiny amount currently burnt. Giving SEFE a further subsidy, such as RECs, to use these fines for electricity is bad business.

Pollution – Plumes from stacks make haze which in turn prevents heat escaping, thus stopping cloud formation; as normal rain bearing clouds fail to form the rain and snow falls of adjacent areas such as the Snowy River which relies on south easterlies, would be affected, according to new research. Pollution will add to the already bad smoke hazes after burning off from logging and from autumn so called ‘fuel reductions’ causing more asthma, etc.

Greenhouse gas emissions - Full carbon accounting must be applied to a project such as a wood fired power station, which is not plantation dependant. When the full native forest fuel cycle is calculated, CO2 emissions would be 6.4 times higher than a modern coal fire power station.

"Renewable" – No, as native forests take up to 200 years to restore levels of carbon, water and the critical hollows for higher order birds and gliders, which are essential to the health of the forests,

It is not a true renewable energy source such as wind, solar and wave.

Conclusion - This proposed wood fired electricity plant is based on uneconomic, unsustainable, unhealthy, polluting, CO2 emitting and downright wrong industry supply chain model.

This is about more subsidies for an already subsidized native forest sector and must be rejected immediately. It is not clean not green and certainly not renewable. Nor are koalas.

Prue Acton OBE

Many Swans, 1476 Sapphire Coast Drive Wallagoot 2550

0264945144

prue.acton@bigpond.com

Attention: Anna Timbrell
 Environmental Planning Officer
 Department of Planning

Re: Environmental Assessment of South east Fibre Exports plan for a
 Biomass fired power Station

I object to this proposal and remind that
 the forest is a very precious resource.

We know that humanity is faced with major environmental challenges. Some of us know that we humans are the root cause of these changes due to the exploitation of the resources on this planet. We need to ask ourselves what is it that we really need to ensure our survival. Water, air, food, shelter comes immediately to mind along with the intangibles of love and respect that we learn as members of a family, community. Electricity while being a convenient way of managing our lives is not a necessity. In order for us to prepare for the changes already manifesting and showing up as planetary warming, the breaking of ice shelves, more extreme flooding and droughts creating food shortages and the displacement of peoples we need to rethink how we are consuming and adapt to a more efficient and caring way of life. Add on the contamination of land and waterways due to the use of chemicals we are facing a precarious balancing act of continued existence.

The Eden chip mill in partnership with Forests NSW has been destroying these forests here for many years. I live and have walked within nature for over 25 years and in this time have witnessed huge changes in the capacity of the creeks and rivers to hold water. Indeed many creeks no longer run and most of our rivers are reduced to stagnating ponds. One can walk for a long time in a 'managed' forest and not see or hear any sign of life. In my forest life is abundant with a diverse range of flora and fauna and there is not one state forest in this area you could show me that would come to close to the complexity of a wild forest.

Waste of forestry logging operations as in the heads and butts was the reason for a chip mill and a propensity for all things paper. No heads and butts have ever gone to the chipper; their machinery cannot deal with them only logs which incidentally were once living organisms. So now we have the bizarre proposal that a chip mill that only uses waste from forestry operations has sufficient waste to burn for electricity. . There is no waste and this is not a green option. We are further informed that there is a world decline in the need for woodchips derived from native forests and that SEFE is looking to expand its options to maintain returns to its shareholders.

It is time for greed to cease ruling our way of life and for the abuse of nature to stop. Indeed nothing in a forest is ever wasted; trees that naturally decay return to the earth via compost and mulch. This is total disrespect to the earth systems that nurture us and can only cause further depletion of our survival needs. What I require from you is the courage to stand up in your humanity and fight tooth and nail for respect and say no categorically to multi nationals seeking to waste our precious earth air water systems.

For our grandchildren's grandchildren let us have the mind and heart to explore options that enhance our living systems and not deny life.

Respectfully a guardian of this earth and all our relations,

Sandra Taylor
P.O.Box 5224
Cobargo, NSW 2550

faerembassy@aussiebroadband.com.au

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0056

From: "Minister Keneally's Office" <office@keneally.minister.nsw.gov.au>
To: <dougald@atabasic.com.au>
Date: 31-03-2009 1:03 pm
Subject: FW: Eden Power Plant - Part 3A assessment

The Hon Kristina Keneally MP, Minister for Planning and Minister for Redfern Waterloo has asked me to acknowledge receipt of your email.

The matters you raised have been noted.

Office of The Hon Kristina Keneally MP
Minister for Planning and
Minister for Redfern Waterloo
Level 35 GMT,
1 Farrer Place Sydney NSW 2000
Postal address: GPO Box 5341 SYDNEY NSW 2001
Telephone: 9228 5811 Fax: 9228 5499
Email: office@keneally.minister.nsw.gov.au

-----Original Message-----

From: Dougald Knuckey [mailto:dougald@atabasic.com.au]
Posted At: Sunday, 29 March 2009 11:37 AM
Posted To: KL_Office_Email
Conversation: Eden Power Plant - Part 3A assessment
Subject: Eden Power Plant - Part 3A assessment

Dear Ms Keneally,

I recently read with disappointment that you are fast-tracking approval of the proposed Eden forest-burning power plant on behalf of South East Forest Exports.

You should realize that 21st century Australia is very much different to

the laissez-faire days of the 70's and 80's. Citizens now expect government to regulate in a manner that does not reduce biodiversity or natural habitat. Not to mention green-house gas emissions!

I would like to know what exactly is your relationship with South East Forest Exports and it's parent companies ? Surely you wouldn't be compelled to make such an ignorant and insensitive judgment to allow this ill-conceived project to proceed unless [REDACTED]

If you cannot reverse this folly I guarantee you will be discredited both privately and publicly. Stupid, ambitious people with no principles

are grist for the mill in public life. Rightly so, don't you agree?

Yours astounded,

Dougald Knuckey

Newcastle Greens Submission Eden Biomass Energy Plant

NEWCASTLE GREENS
PO Box 269
NEWCASTLE 2300
secretary@newcastle.nsw.greens.org.au

26th April 2010

ATTN: Ms Anna Timbrell
 Planner
 Department of Planning
anna.timbrell@planning.nsw.gov.au

**RE: South East Fibre Exports 5MW Biomass-Fired Power Station –
 Environmental Assessment**
Assessment Type: Part 3A
Application Number: MP09_0034
Local Government Area: Bega Valley Shire

The proposed South East Fibre Exports 5MW Biomass-Fired Power Station Environmental Assessment (EA) states: *“Eligible renewable energy sources under the RET include hydroelectric, wind, solar, **biomass**, geothermal, wave and tidal energy”*.

The Newcastle Greens wish to outline the following serious shortcomings that the Environmental Assessment (EA) presents in its current form:

1. Biomass sourced from forest timbers should not be considered a renewable resource. Parliament has not yet decided whether or not biomass fuels will qualify for Renewable Energy Certificates (RECs) under the Large Scale Renewable Energy Target (LRET) or Small Renewable Energy Certificate (SREC) schemes. Further, the EA does not state that the Power Station will only use sustainably harvested timbers. If the wood waste that is used is not from sustainable plantation forests, then it is a farce to consider such a plant as a “renewable energy plant”.

2. The establishment of a Biomass Power Station is not the most efficient or effective use of government/ council resources. Given the current council/governments’ goal is to “invest in base load electricity supply which is market competitive and consistent with current trends and future energy demands” (Source: EA 19.1.2 Intergenerational Equity), the EA should clearly compare the costs and generating capabilities of the biomass Power Station to

other viable energy resource plants. The primary function of the SEFE site is to produce wood chips and the proposed biomass Power Station is to supply electricity for its operation (EA Chapter 19 and 11.2.3). Local stakeholders are misleadingly listed as being beneficiaries to the proposal.

3. As the electricity market exists today, once electricity is sold into the grid, a small scale supplier has no impact on delivery to the end consumer. As such, SEFE and the council/government can not confidently or responsibly claim that the establishment of this biomass Power Station will have **any** positive outcomes for local stakeholders.

4. The EA compares “mature” biomass energy production with present coal fired electricity generation, but fails to clearly consider other suitable energy generating technologies that we believe could sustainably provide energy security to local stakeholders. Both grate fired biomass combustion and the majority of existing coal fired generators (by and large considered some of the dirtiest in the world), are outdated technologies.

The proposal makes no attempt to look at the comparative advantages and disadvantages of a solar power station capable of producing 5.5 MW per annum. The latter may have a higher capital investment, but eliminates CO2 emissions created by a biomass power station, including production and transportation of raw materials.

5. The EA does not state that a reliable resource (biomass) base is guaranteed (EA11.3) at a guaranteed price for a feasible life of the proposed power station.(say thirty years). The EA anticipates an increase in biomass material being required to fuel the generation plant, thus requiring more truck movements in the future (EA Chapter 11). Local constituents should be informed of this fact, and the increased cost on local government for maintenance and renovation of roads should be considered within the power station costs.

6. Experience in the US has indicated that biomass power stations that do not utilize cutting edge technology are not economically sustainable. In fact, the American experience shows that without continued Government subsidy, these plants are closing down. (Source: Production of Electricity from Biomass Crops). This is of particular concern since the SEFE proposal has not identified an off-take market for the co-generation of heat produced during the power generation process (see 3.3.3).

In the first instance, the endorsement of a biomass fuelled electricity plant must be predicated on the most efficient utilization of biomass material. The proposed SEFE plant is not a co-generation plant (ie combined heat and power) and as a consequence will only achieve an overall efficiency of some 40% instead of an optimum attainable of some 80% (Source; Dr Steve Schuck).

Although the EA recognizes that a market for the heat generated in the power generation process should be identified, it should be a pre-condition for any approval to be based on the efficient utilization of the energy producing resource.

7. The Newcastle Greens encourage investment into the generation of electrical power that is not dependent on the burning of fossil fuel. We advocate that if investment is to be subsidized and approved by Government it should be truly sustainable, and have a net positive impact on reducing greenhouse gas emissions.

Yours faithfully,

Megan Benson, **Secretary**
On behalf of Newcastle Greens.

Reference sources –

- Environmental Assessment SEFE 5.5MW Biomass Power Plant, URS Australia Pty Ltd.
- Biomass Energy & the Mandatory Renewable Energy Target, Briefing paper for Senator Christine Milne, Prepared by Dr Jane Growns July 2009
- Production of Electricity from Biomass Crops – US Perspective. Ralph P Overend, Industrial Technologies Division, National Renewable Energy Laboratory. Report for US Department of Energy 1996
www.mtholyoke.edu/courses/tmillec/course/geog
- Eucalyptus biomass fuels; Price competitive or way off the money. Martin van Bueren and David Vincent, Rural Industries Research Development Corporation. 47th Annual Conference of the Australian Agricultural and Resource Economics Society, Perth 2003.
www.thecie.com.au/content/publications/CIE-eucalpyt_biomass_fuels.pdf
- Carbon Reduction Institute www.noco2.com.au
- Dr Steve Schuck, Manager Bioenergy Australia, Presentation to Australian Academy of Science March 2009
<http://www.science.org.au/events/publiclectures/re/schuck.html>
- Wiki pedia <http://en.wikipedia.org/wiki/Biomass>



I am writing because I have many concerns regarding the proposed wood fired power station that South East Fibre Exports, the owners of the Eden chip mill, want to build.

Why, when new technologies are being developed is New South Wales even considering go with the idea of burning our native forests for power? One new power source is the burning of the waste at the tips. It is called bio-mass gasification. It basically cooks the waste and that creates gas that is turned into electric power. This process also reduces landfill by 80%! It's a win-win. It is being used in England and Springwood, Qld. I saw this on ABC's Stateline on 9 April. These technologies are available. Why would we go with such an out-dated concept of burning our native forests for power? We need to support new ideas that will save our planet; not destroy it.

The proposal states that the power station will be fuelled with 'waste wood' from logged trees in our native forests. This wood is not waste. It is home to our native animals and stores carbon to help keep our air clean. The wood left over after logging is there due to sloppy logging methods and sawing procedures at the mills. It is ironic that Australia pays other countries tens of millions of dollars not to log their native forests, but we log our own. According to the International Union for the Conservation of Nature 2008 report, Australia has the worst record of mammal extinctions or near extinctions of any developed nation in the world due to deforestation.

I know that the wood chip industry is in a down turn because foreign markets are resisting buying wood from our native forests. So, now rather than looking at cleaner power alternatives, the owner of the chip mill is eyeing another destructive avenue for making money. It is a disgrace that a plan to burn and destroy one million tonnes of our native forests per year for the profit of a few is even being considered. And when the native forests are gone, what will we use for power? This is a short-sighted option that doesn't plan for the future. We should be serious about pursuing renewable energy that can be generated more economically at this site e.g. wind, solar or tidal technologies. Tree regrowth takes decades and a great deal of water. However, the sun, the wind and the tides do not need to regenerate. They are readily accessible.

Another concern is the marine life in Twofold Bay. The temperature of the water to be used in the cooling process at the furnace will be at least 21 degrees hotter than the ocean temperature in the winter. This will have a dire effect on the marine life in the bay. The threatened Weedy Sea Dragon cannot survive in temperatures higher than 22 degrees. The poor Green sea turtles will be attracted to the warmer temperatures only to be sucked in and trapped in the cooling pipes.

I also have fears regarding algae bloom resulting from these higher temperatures. The toxic treatment of the heated water will add to this bloom and make the water unsafe for sea animals and people. This will have a catastrophic effect on the tourist trade in the area. Who is going to dive where the water stinks like rotten eggs and is polluted?

The real economic future of this area is its natural beauty and wild life. Tourism and whale watching tours are the businesses in Eden. However, the noise from the furnace could scare the whales away from Twofold Bay.

The developers of this project can gloss over the results of their financial activities but they won't have to personally live with the mess. The owners live in Japan.

For the sake of the future of our children, we must go with cleaner and more easily renewable energy. At first it may seem more expensive, but over the long run: the sun, the wind and the tides are the most economical way to go. The proposed furnace is not efficient. There will be 75% heat loss. If this reckless project goes ahead, our carbon storing, water storing, native animal housing, rain making, tourist attracting, beautiful native forests will be burnt and turned into ash polluting sediment.

The proposal looks very slick and glossy. However, people are not so easily fooled any more by these facades. Please use some imagination. Let's leave the Neanderthal solutions in the past.

Daniel Katz
16 Edna Drive
Tathra, 2550
NSW

6494-5887



I am very concerned regarding this woodfired power station, i can't believe this would even be considered as a viable power solution when there are so many other ways to harness energy like the wind, water and tides which are also a lot better for our world.We need to help the earth recover not destroy her some more Please do not approve this application.

Name: Joanne Nicholson

Address:
17 Esther St Tahra NSW 2550

IP Address: begax1-223.dialup.optusnet.com.au - 203.164.30.223

Submission for Job: #2914 Biomass-Fired Power Station
https://majorprojects.onhiive.com/index.pl?action=view_job&id=2914

Site: #1828 South East Fibre Exports 5 MW Biomass-Fired Power Station
https://majorprojects.onhiive.com/index.pl?action=view_site&id=1828

Anna Timbrell

E: anna.timbrell@planning.nsw.gov.au



I strongly object to the setting up of a Bio.Mass fired powerstation at Eden Chipmill site south of Eden. Application no MP09-0034 On the grounds of long term environmental damage done for minimal benefit. We should be using wind or solar or both especially on this site, or even tidal technology.

Name: Paul Robert Stevens
Organisation: N/A

Address:
Burragate Road Wyndham 2550 NSW

IP Address: - 114.129.160.198

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Anna Timbrell

E: anna.timbrell@planning.nsw.gov.au





Save the koalas of the South East Forests of NSW from extinction and to stop the woodchipping of these forests, including for electricity generation.

State Forests (a NSW Government agency) is about to start woodchipping the forest areas where the last remaining koalas survive in the south east. A fragile, surviving colony of up to 50 koalas has been identified recently, by your own Environment Department, in a region that once had hundreds of thousands of koalas.

At the same time the NSW ALP Government is considering approval for a woodchip fired power plant at the Eden Woodchip Mill contrary to its promise never to use native forest wood for energy generation.

I believe a woodchip fired power station at Eden is: -

-  not a genuine 'clean green energy source' and will undercut solar, tidal and wind power generators.
-  not acceptable given the urgent need to stop logging, woodchipping and clearing of native forests around the world, including Australia, to reduce CO2 emissions. We could save up to 20% of Australia's CO2 emissions if we stopped this destruction of forests and woodlands here, NOW.
-  'Dead Koala Power' in that it will assure the regional extinction of the South East Forests' koalas and many other endangered forest species including owls, gliders, possums, bats and Superb Parrots.
-  opens up a vast new market for woodchips on top of the massive export market of woodchips for paper production. Nearly a million tonnes a year are exported right now from Eden to Japan.

I believe it is time that the NSW Government took all logging and woodchipping out of our wonderful forests and created a genuinely sustainable logging industry based on plantations.

I want to see the NSW Labor Government commit to such an approach before the next State election.

Does NSW Labor want my vote? Stop this ridiculous project proposal immediately, and start getting real about protecting, not destroying our environment.

Yours sincerely,
Julius Timmerman

Name: Julius Timmerman

Address:
22 Wilson St
Lawson NSW 2783

IP Address: - 203.10.224.94

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Anna Timbrell

E: anna.timbrell@planning.nsw.gov.au





As a citizen of NSW I find it highly objectionable that the NSW Govt. would even consider the proposition of a bio-mass power plant at the Eden chip mill. That this power plant will add substantial amounts of pollution into the air is of itself a serious concern. But worse still is the need for this power station to be fuelled by the felling of native forest.

The Eden chip-mill should have been self sustaining long ago, but the availability of cheap native forest courtesy of Forest NSW ensured that the Japanese owners had no interest in self sufficiency.And now that the price of woodchip has fallen the next step in this cynical exercise is to continue to fell the native forests for firewood. That FNSW have for so long avoided the RFA review is in itself testament to theunsustainable practises that are used to feed the chip-mill,and the fact that even Koala habitat is now being logged is a damning indictment on this practice. It is obvious to anyone with half a brain that this proposal will doom the forest of SE NSW,with no help to the environment but rather yet another polluting industry and a prop to the Japanese owners of the chip-mill for which the NSW taxpayers will pay. The proposal is in no way sustainable and should be rejected on that ground.

Name: Robynne Burchell
Organisation: Private citizen

Address:
Bataan Cottage,Link Road
Mila

IP Address: - 58.163.136.196

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Anna Timbrell

E: anna.timbrell@planning.nsw.gov.au





This is an initial reaction to a very complex document . We operate the only mussel farm in NSW and are at present expanding our operations with 32 hectares being developed at nearby Torrigo Point.

A major concern of ours is the proposed disposal of fly ash from the power plant.

The bottom ash and coarse fly ash -293 tonne per annum will be stockpiled and the transported off site for disposal while 32 tonnes per annum of the fine ash fraction that is to be collected and disposed in landfill on site -Chapter 13 Page 7 5th paragraph.

No indication given of how the coarse fly ash will be stored prior to transport off site while the fine fly ash will be buried on site and given the level of heavy metals contained in the fly ash - Chapter 17-8 Tables 17-3 and 17-4 we feel that both proposals pose a significant and unacceptable potential for pollution of the marine environment.

Two other areas of possible concern to us are the possible impacts on the plankton stream that flows past the wharf and around the Bay .This contains both food for our mussels and larval mussel that we rely on.

The temperature increase from the cooling water discharge and the possible release of copper ions from the antifouling protection for the system require further consideration and we will put in an additional submission at a later date.

Name: Christopher Boyton
Organisation: EDEN SEA FARMS

Address:
PO Box 365
Pambula NSW
2549

IP Address: cpe-124-176-122-253.lns8.ken.bigpond.net.au - 124.176.122.253

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Anna Timbrell

E: anna.timbrell@planning.nsw.gov.au





I am very concerned regarding the proposed wood fired power station that South East Fibre Exports wants to build. This seems to me to be a extremely short sighted option that will profit a few but will have very long term harmful effect on our waterways, our wildlife and our native forests that are our children and grandchildren's future. How can we pay other countries large sums to money so they wont log their countries native forests but we log our own. Particularly when there are other more viable alternatives.

Surely we should be looking at pursuing renewable energy that is not enviromentally damaging rather than destroying one of our most precious resources. In this day and age with all our knowledge of climate change, the importance of clean air and water and the research showing the tremendous value of our forests to these, I find it unbelievable that this proposal is even being considered.

Name: Judy Dickmann

Address:
2359 Mt. Darragh Rd.
Wyndham 2550

IP Address: cpe-58-166-95-196.lnse5.cht.bigpond.net.au - 58.166.95.196

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Anna Timbrell

E: anna.timbrell@planning.nsw.gov.au

Glenn Willcox
150 Newtown Road
Bega
NSW
2550
glenn.willcox3@bigpond.com

15th April 2010

As a long time resident of Bega I would like the following submission to be considered in relation to the establishment of the proposed power generation plant at the SEFE complex near Eden NSW.

This proposal should be rejected outright as the establishment of such an operation would further entrench the logging of native forests for woodchips. This wood chip industry should have, and I believe has, no future in this region. The continued destruction of native forests for woodchips is not justifiable on numerous grounds including high carbon emissions, habitat destruction and the general unsustainability of its operations. As the power generation plant relies on 'waste' from this industry it should not be approved.

The woodchip industry itself was established on the premise of using 'waste' from sawlog operations to supply materials for chipping. It has been shown that, far from chipping only 'waste' material, approximately 90% of logging in the region is carried to supply the chipmill. I envisage that as the market for woodchip exports collapses, as it will, this vast amount of non 'waste' material will then be fed into the furnace.

I would suggest that the proposed establishment of the power station is aimed at entrenching a few unsustainable logging jobs as SEFE can see that there is no future in attempting to sell wood chips that are unacceptable to the market place, primarily because of the destructive nature of their production.

The 'green' power credentials of this power station are established via the complete removal from calculations of the nature of the industry that supplies the fuel, namely woodchip logging. This farce will create a lack of confidence in the renewable energy sector and compromise the establishment of real renewable energy options.

While I understand that there are peoples jobs tied up in this unsustainable industry the costs of a continuation are too high. It is time for the government to establish an exit strategy from native forest logging that includes retraining and other support for industry workers and their families.

Below is a point by point summary of concerns that I hold and which establish beyond doubt the unsuitability of this proposal.

Thank you for the opportunity to voice my concerns re this proposal and I await word of its rejection as this is the only sensible option.

Yours sincerely

Glenn Willcox

1. General Comments

1. The chipmill announced on 22 March 2010 that this project is “on hold,” before it has even been approved. The Minister should therefore reject it or if he approves it, impose a condition that if no commencement has occurred within 6 months, the approval should lapse. Its status as “on hold” reflects the state of the international woodchip market and demonstrates how dependent it is on that market.
2. The fuel to be used is not “waste” and would not exist if one million tonnes of trees (almost 19,000 hectares of forest) were not logged each year to supply the chipmill.
3. The existing use of the proposed fuel generates substantially less greenhouse gas than the proposed power station because, as mulch, it decomposes slowly and transfers significant carbon to the soil.
4. The scope of this assessment is so narrowly defined as to make it almost meaningless. It examines in minute detail some aspects but ignores the bigger context. For example, it refers to the “terrestrial ecology” of the site as having “a disturbed under storey of exotic grasses”, in other words, mown lawn, but totally ignores the immense ecological implications of intensive, industrial scale logging required to supply the fuel.
5. While acknowledging that deadly dioxins, furans and HAPs will be emitted, the EA does not examine the human health implications of the emissions at all.

2. In relation to concerns of the natural environment

1. Very hot water will be discharged into Twofold Bay. The temperature of cooling water discharged into Twofold Bay will be more than 21 degrees above the ambient water temperature in the winter. The implications of this are dismissed, but there are some serious consequences:
 - a. The Weedy Sea Dragon (8-21), a threatened species, can only survive in temperatures less than 22 degrees. The EA says that the sea dragons will go somewhere else: they “may avoid the area around the outlet.” Too bad for them if they don’t.
 - b. Green Sea Turtles. The presence of these creatures is noted but the report fails to mention that in other power stations in NSW, turtles are regularly trapped in cooling water pipes because they are attracted by the warmer temperature.

- c. Whales. Noise may interfere with whale migrations via Twofold Bay (8-10)
 - d. Anti-fouling treatments (8-17). Toxic treatments may threaten marine life and mussel culture.
- 2. Emissions estimates, especially in relation to particulates and heavy metals assume that the wood will be clean and uncontaminated and no consideration is made for its exposure to salt.
 - a. SEFE CEO Peter Mitchell explicitly told the Bega Valley Shire council on 26 August 2008 that "municipal waste" was a potential fuel.
 - b. The stockpile of fuel will be stored a few meters from the ocean where it will be contaminated by salt, increasing dioxin levels.
 - c. Heavy metal content in ash will exceed allowable limits and additional approval from DECC will be required to use it on the SEFE Rockton plantation. Exposure to heavy metals has been linked to penis defects. <http://www.smh.com.au/lifestyle/wellbeing/heavy-metals-raise-risk-of-penis-defects-20091202-k6es.html>
 - d. A Canadian study commissioned the government of British Columbia (Canada) last year. "Emissions from Wood-Fired Combustion Equipment" http://www.env.gov.bc.ca/epd/industrial/pulp_paper_lumber/pdf/emissions_report_08.pdf found that basic emissions which could be expected include:
Acetaldehyde Alpha-pinene Beta-pinene Carbon monoxide (CO) Formaldehyde Methanol Naphthalene Toluene Total phenols Turpentine 2,3,7,8 Tetrachlorodibenzo-p-dioxin (TCDD) C/P 2,3,7,8-Tetrachlorodibenzo-p-furan C/ Hydrogen sulphide C/S Nitrogen oxides (NOx) Beryllium Cadmium and compounds Chromium (II) compounds, as Cr Chromium (III) compounds, Cr Chromium (metal) Chromium (total) Chromium, hexavalent metal and compounds Cobalt as Co metal Dust and fume Cobalt carbonyl as Co Copper, Dusts and mists, as Cu3 Copper, Fume Iron Lead arsenate, as Pb3 (As2O4) Lead chromate, as Cr Lead compounds Magnesium Manganese Molybdenum Nickel and compounds Particulate matter (PM) Phosphorus Selenium Silver Thallium Zinc Arsenic and inorganic arsenic compounds Mercury Hydrochloric acid Sulphuric acid Sulphur dioxide (SO2)

3. In relation to concerns about climate change

- 1. Electricity generated from native forest wood is more greenhouse intensive than coal fired power.
- 2. It will compete with and potentially displace genuine renewables permitted under the Mandatory Renewable Energy Target MRET scheme. It will not be competing with coal.
- 3. The project depends for its fuel on the continued existence of the native forest woodchipping industry, one of Australia's biggest greenhouse polluters.
- 4. The EA does not look at the full life cycle of the fuel (i.e. it ignores the greenhouse impacts of native forest logging; it simply asserts this is "sustainable because it has Australian Forestry Standard (AFS) certification). It fails to examine the consequences of the one million tonnes of woodchipping each year, without which there would be no fuel.

5. It claims: "Improved environmental outcomes due to lower greenhouse gas emissions per unit of output compared to conventional coal-fired power generation technologies. The proposed plant would potentially avoid the emission of 23,800 t Of CO₂-e from fossil-fuel based power generation per year."

Logging of native forests to supply the Eden chipmill has been conservatively estimated at over 18 million tonnes per year¹ with one estimate as high as 61 million and another as low as 9 million tonnes. Logging emissions must be counted in assessing the GHG implications of burning native forest wood for electricity. It is simply not valid to start counting at the furnace door; the whole life cycle of the fuel must be taken into account in measuring greenhouse impacts.

When power generated from native forest is compared with coal fired power, if the full life cycle of the fuel is assessed, wood fired power is as much as 6.4 times more greenhouse intensive than coal fired power².

4. In relation to concerns about woodchipping.

1. Without ongoing woodchipping of a million tonnes of native forest a year, there would be no fuel available.
2. Sustainability of native forest logging. No serious attempt is made to assess this. It is simply deemed "sustainable" because most SEFE chips are certified under the highly controversial AFS. Japanese paper manufacturers are increasingly reluctant to accept AFS as an adequate label of sustainability and the biggest paper manufacturing company in Japan, Oji, does not accept it.
3. The EA claims "Improved environmental outcomes due to lower greenhouse gas emissions per unit of output compared to conventional coal-fired power generation technologies. The proposed plant would potentially avoid the emission of 23,800 t Of

¹ Carbon pollution generated by logging for the Eden chipmill

According to Mackey et al "Green Carbon" 2008, the average carbon carrying capacity for all the SE Australia eucalypt forests is 640 tonnes per hectare. In those forests in SE NSW where the actual carbon stored is currently less than the carrying capacity, this is entirely due to the previous operations of the Eden chipmill over the past 40 years, so it is valid to use Mackey's figure of 640.

According to FOI information, in 2006-07 FNSW logged 14,388 hectares in the Eden, South Coast/Southern and Tumut areas.

The figures below do not include the emissions from running the mill, and transport associated with logging contractors or deliveries to the mill. The calculation is based on:

Area logged x Carbon stock per ha x 40% (loss from logging) x 3.666 (converting C to CO₂)

Thus, for NSW:

$14,388 \times 640 \times .4 \times 3.666 = 13,503,080$ tonnes of CO₂

For East Gippsland:

$4,500 \times 700 \times .4 \times 3.666 = 4,611,600$ tonnes

Total: 18,114,680 tonnes.

40% of the carbon stored in a forest is lost to the atmosphere when it is logged, even after 150 years. The weight of a carbon dioxide molecule is 3.666 times the weight of a carbon atom. Approx hectares logged in East Gippsland in 2007.

² Dr John Kaye MLC. Adjournment Speech 2 December 2008 "Our very rough analysis, based on forestry industry and peer-reviewed data, suggests that for every megawatt hour of energy generated by south-east native forestry biomass, more than 6.4 tonnes of CO₂ would be released instantaneously. This is more than **6.4 times the amount of CO₂ released from burning coal to produce the same amount of energy.** Certainly regrowth would bio-sequester some of this carbon but at a very slow rate. It would take about 80 years of regrowth to capture 5.4 tonnes, thus returning the greenhouse gas emissions to the same level as coal." <http://www.john.greens.org.au/media/adjournment-speech-eden-chipmill-and-green-power>

C02-e from fossil-fuel based power generation year.” See point 4 under “If you are concerned about climate change.”

All emissions from logging should be counted in assessing the GHG implications of burning native forest wood for electricity. It is simply not valid to start counting at the furnace door; the whole life cycle of the fuel must be taken into account in measuring greenhouse impacts. GHG emissions from the proposed plant should be compared with those of other MRET approved technologies, not with coal fired power.

4. However, even if it is compared with coal fired power, if the full life cycle of the fuel is assessed, wood fired power is possibly 6.4 times more greenhouse intensive than coal fired power. It is claimed that “no native or plantation forest would be felled for the purpose of fuelling the plant” (19-3). Forests NSW expects that some timbers which are not currently used for woodchipping because they are either too red or too hard, and are not of sawlog quality will be used for power generation.

Anna Timbrell - Online Submission from ~~Anna Timbrell~~ (object)

Please, I don't wish my contact details to be given to the proponents. Thanks.

SAY NO TO WOODCHIP POWER!!!

It is a madness to consider expanding the woodchip mill for biomass energy.

[REDACTED]

Previously they have said that they use all parts of a tree for woodchips but we know they only use the trunks. Today I heard the manager say that they wouldn't collect all the bits from the forest because it would cost too much!

Europe use every bit of their forest. From high quality wood to the bits of sawdust. Whereas we just trash it all. It's all waste.

I'm sickened by the legacy of the Federal Government's 1975 wood supply agreement and its ongoing morphings that just get worse and worse.

Please, do something for the children - just say NO!

Thank you.



IP Address: cpe-121-217-211-57.lnse3.cht.bigpond.net.au - 121.217.211.57

Submission for Job: #2914 Biomass-Fired Power Station
https://majorprojects.onhiive.com/index.pl?action=view_job&id=2914

Site: #1828 South East Fibre Exports 5 MW Biomass-Fired Power Station
https://majorprojects.onhiive.com/index.pl?action=view_site&id=1828

Anna Timbrell

E: anna.timbrell@planning.nsw.gov.au



I feel very strongly that the proposed power station is a severe threat to the health of our natural environment, and to the health of residents in the Bega Valley. It concerns me greatly that the almighty dollar is continuing to be placed ahead of our natural resources... in fact take complete advantage of them. There are endless opportunities for further jobs to be created in projects which are actually environmentally sustainable.

Logging our state forests so savagely is not of benefit to our country financially or otherwise. Tourism is beginning to suffer, not to mention the decline in population of our native wildlife... some of which is teetering dangerously on extinct.

I implore you to prevent the development of this power station going ahead. The south coast of NSW is one of the few places in Australia that may still have a fighting chance of preserving a good percentage of it's natural heritage.

Name: Firstname Surname
Organisation: n/a

Address:
PO Box 364, Bega, 2550

IP Address: 24.19.70.115.static.exetel.com.au - 115.70.19.24

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Anna Timbrell

E: anna.timbrell@planning.nsw.gov.au



The wood fired power station will entrench the woodchipping industry, damage the local environment and compete unfairly against genuine renewable energy. See attached for details.

Name: Harriett Swift
Organisation: Chipstop campaign against woodchipping

Address:
PO Box 797,
Bega NSW 2550

IP Address: itr-0005.gw1.syd2.asianetcom.net - 203.192.130.94

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https://majorprojects.onhiive.com/index.pl?action=view_site&id=1828

Anna Timbrell

E: anna.timbrell@planning.nsw.gov.au



Submission from Harriett Swift, Chipstop on the Eden woodchip forest furnace:

1. General
2. Impacts on the natural environment
3. It will make climate change worse
4. It will entrench the woodchipping industry
5. It will expose the town of Eden to toxic emissions and diminish the amenity of Twofold Bay
6. It will compete unfairly with genuine renewable energy.

1. General

1. The chipmill announced on 22 March 2010 that this project is “on hold,” before it has even been approved. The Minister should therefore reject it or if he approves it, impose a condition that if no commencement has occurred within 6 months, the approval should lapse. Its status as “on hold” reflects the state of the international woodchip market and demonstrates how dependent it is on that market.
2. The fuel to be used is not “waste” and would not exist if one million tonnes of trees (almost 19,000 hectares of forest) were not logged each year to supply the chipmill.
3. The existing use of the proposed fuel generates substantially less greenhouse gas than the proposed power station because, as mulch, it decomposes slowly and transfers significant carbon to the soil.
4. The scope of this assessment is so narrowly defined as to make it almost meaningless. It examines in minute detail some aspects but ignores the bigger context. For example, it refers to the “terrestrial ecology” of the site as having “a disturbed under storey of exotic grasses”, in other words, mown lawn, but totally ignores the immense ecological implications of intensive, industrial scale logging required to supply the fuel.
5. While acknowledging that deadly dioxins, furans and HAPs will be emitted, the EA does not examine the human health implications of the emissions at all.

2. Impacts on the natural environment

1. Very hot water will be discharged into Twofold Bay. The temperature of cooling water discharged into Twofold Bay will be more than 21 degrees above the ambient water temperature in the winter. The implications of this are dismissed, but there are some serious consequences:
 - a. The Weedy Sea Dragon (8-21), a threatened species, can only survive in temperatures less than 22 degrees. The EA says that the sea dragons will go somewhere else: they “may avoid the area around the outlet.” Too bad for them if they don’t.
 - b. Green Sea Turtles. The presence of these creatures is noted but the report fails to mention that in other power stations in NSW, turtles are regularly trapped in cooling water pipes because they are attracted by the warmer temperature.
 - c. Whales. Noise may interfere with whale migrations via Twofold Bay (8-10)
 - d. Anti-fouling treatments (8-17). Toxic treatments may threaten marine life and mussel culture.
2. Emissions estimates, especially in relation to particulates and heavy metals assume that the wood will be clean and uncontaminated and no consideration is made for its exposure to salt.
 - a. SEFE CEO Peter Mitchell explicitly told the Bega Valley Shire council on 26 August 2008 that “municipal waste” was a potential fuel.
 - b. The stockpile of fuel will be stored a few meters from the ocean where it will be contaminated by salt, increasing dioxin levels.
 - c. Heavy metal content in ash will exceed allowable limits and additional approval from DECC will be required to use it on the SEFE Rockton plantation. Exposure to heavy metals has been linked to penis defects.
<http://www.smh.com.au/lifestyle/wellbeing/heavy-metals-raise-risk-of-penis-defects-20091202-k6es.html>

- d. A Canadian study commissioned the government of British Columbia (Canada) last year. "Emissions from Wood-Fired Combustion Equipment"
http://www.env.gov.bc.ca/epd/industrial/pulp_paper_lumber/pdf/emissions_report_08.pdf found that basic emissions which could be expected include:

Acetaldehyde Alpha-pinene Beta-pinene Carbon monoxide (CO) Formaldehyde Methanol Naphthalene Toluene Total phenols Turpentine 2,3,7,8 Tetrachlorodibenzo-p-dioxin (TCDD) C/P 2,3,7,8-Tetrachlorodibenzo-p-furan C/ Hydrogen sulphide C/S Nitrogen oxides (NOx) Beryllium Cadmium and compounds Chromium (II) compounds, as Cr Chromium (III) compounds, Cr Chromium (metal) Chromium (total) Chromium, hexavalent metal and compounds Cobalt as Co metal Dust and fume Cobalt carbonyl as Co Copper, Dusts and mists, as Cu3 Copper, Fume Iron Lead arsenate, as Pb3 (As2O4) Lead chromate, as Cr Lead compounds Magnesium Manganese Molybdenum Nickel and compounds Particulate matter (PM) Phosphorus Selenium Silver Thallium Zinc Arsenic and inorganic arsenic compounds Mercury Hydrochloric acid Sulphuric acid Sulphur dioxide (SO2)

3. It will entrench the woodchipping industry

1. Electricity generated from native forest wood is more greenhouse intensive than coal fired power.
2. It will compete with and potentially displace genuine renewables permitted under the Mandatory Renewable Energy Target MRET scheme. It will not be competing with coal.
3. The project depends for its fuel on the continued existence of the native forest woodchipping industry, one of Australia's biggest greenhouse polluters.
4. The EA does not look at the full life cycle of the fuel (i.e. it ignores the greenhouse impacts of native forest logging; it simply asserts this is "sustainable because it has Australian Forestry Standard (AFS) certification). It fails to examine the consequences of the one million tonnes of woodchipping each year, without which there would be no fuel.
5. It claims: "Improved environmental outcomes due to lower greenhouse gas emissions per unit of output compared to conventional coal-fired power generation technologies. The proposed plant would potentially avoid the emission of 23,800 t Of CO2-e from fossil-fuel based power generation per year."

Logging of native forests to supply the Eden chipmill has been conservatively estimated at over 18 million tonnes per year¹ with one estimate as high as 61 million and another as low as 9 million tonnes. Logging emissions must be counted in assessing the GHG implications of burning native forest wood for electricity. It is simply not valid to start counting at the furnace door; the whole life cycle of the fuel must be taken into account in measuring greenhouse impacts.

When power generated from native forest is compared with coal fired power, if the full life cycle of the fuel is assessed, wood fired power is as much as 6.4 times more greenhouse intensive than coal fired power².

¹ Carbon pollution generated by logging for the Eden chipmill

According to Mackey et al "Green Carbon" 2008, the average carbon carrying capacity for all the SE Australia eucalypt forests is 640 tonnes per hectare. In those forests in SE NSW where the actual carbon stored is currently less than the carrying capacity, this is entirely due to the previous operations of the Eden chipmill over the past 40 years, so it is valid to use Mackey's figure of 640.

According to FOI information, in 2006-07 FNSW logged 14,388 hectares in the Eden, South Coast/Southern and Tumut areas.

The figures below do not include the emissions from running the mill, and transport associated with logging contractors or deliveries to the mill. The calculation is based on:

Area logged x Carbon stock per ha x 40% (loss from logging) x 3.666 (converting C to CO2)

Thus, for NSW:

14,388 x 640 x .4 x 3.666 = 13,503,080 tonnes of CO2

For East Gippsland:

4,500 x 700 x .4 x 3.666 = 4,611,600 tonnes

Total: 18,114,680 tonnes.

40% of the carbon stored in a forest is lost to the atmosphere when it is logged, even after 150 years. The weight of a carbon dioxide molecule is 3.666 times the weight of a carbon atom. Approx hectares logged in East Gippsland in 2007.

² Dr John Kaye MLC. Adjournment Speech 2 December 2008 "Our very rough analysis, based on forestry industry and peer-reviewed data, suggests that for every megawatt hour of energy generated by south-east native forestry biomass, more than 6.4 tonnes of CO2 would be released instantaneously. This is more than **6.4 times the amount of CO2 released from burning coal to produce the same amount of energy**. Certainly regrowth would bio-sequester some of this carbon but at a very slow rate. It would take about 80 years of regrowth to capture 5.4 tonnes, thus returning the greenhouse gas emissions to the same level as coal." <http://www.john.greens.org.au/media/adjournment-speech-eden-chipmill-and-green-power>

4. It will entrench the woodchipping industry

1. Without ongoing woodchipping of a million tonnes of native forest a year, there would be no fuel available.
2. Sustainability of native forest logging. No serious attempt is made to assess this. It is simply deemed "sustainable" because most SEFE chips are certified under the highly controversial AFS. Japanese paper manufacturers are increasingly reluctant to accept AFS as an adequate label of sustainability and the biggest paper manufacturing company in Japan, Oji, does not accept it.
3. The EA claims "Improved environmental outcomes due to lower greenhouse gas emissions per unit of output compared to conventional coal-fired power generation technologies. The proposed plant would potentially avoid the emission of 23,800 t Of CO₂-e from fossil-fuel based power generation year." See point 4 under "If you are concerned about climate change."

All emissions from logging should be counted in assessing the GHG implications of burning native forest wood for electricity. It is simply not valid to start counting at the furnace door; the whole life cycle of the fuel must be taken into account in measuring greenhouse impacts. GHG emissions from the proposed plant should be compared with those of other MRET approved technologies, not with coal fired power.

4. However, even if it is compared with coal fired power, if the full life cycle of the fuel is assessed, wood fired power is possibly 6.4 times more greenhouse intensive than coal fired power. It is claimed that "no native or plantation forest would be felled for the purpose of fuelling the plant" (19-3). Forests NSW expects that some timbers which are not currently used for woodchipping because they are either too red or too hard, and are not of sawlog quality will be used for power generation.

5. It will expose the town of Eden to toxic emissions and diminish the amenity of Twofold Bay

1. While acknowledging that deadly dioxins, furans and HAPs will be emitted, the EA does not examine the human health implications of the emissions at all.
2. Emissions estimates, especially in relation to particulates and heavy metals assume that the wood will be clean and uncontaminated and no allowance is made for its exposure to salt.
 - (a). SEFE CEO Peter Mitchell explicitly told the Bega Valley Shire council on 26 August 2008 that "municipal waste" was a potential fuel.
 - (b). The stockpile of fuel will be stored a few meters from the ocean and will be contaminated by salt, increasing dioxin levels.
3. It will not "improve the reliability of the local electricity supply." (19-2)
In 2009, the Eden chipmill was closed for weeks at a time, for most of the year it was on a 4 day week. If Eden residents were counting on it to power their homes in 2009, they would have experienced many outages.
4. Emissions inventory states that "most of the particulate matter will be controlled," especially particulates of greater size. There is no examination of the nature, volume and consequences of particulates bigger than 10 microns. There is no justification provided for ignoring them. The EA leaves open the possibility that some of these bigger particulates will be emitted, but fails to provide any detail of the nature, volume and consequences of those emissions.
5. Odour. While it is acknowledged that sulphur dioxide, rotten egg gas will be generated, there is no consideration of odour as an issue to be addressed. Neither are the acid rain consequences of sulphur dioxide emissions addressed.
6. Bega Valley Shire Council Zoning. The chipmill site is currently zoned 1(A) agricultural, arguably not appropriate for this type of development.
7. Recreational divers will have reduced access to the chipmill jetty (8-23)
8. Anti-fouling treatments (8-17). Toxic treatments may threaten marine life and mussel culture.

6. It will compete unfairly with genuine renewable energy.

1. Electricity generated from native forest wood fired power is even more GHG intensive than coal.
2. In assessing greenhouse implications and calculating "avoided emissions" this power should be compared with wind or solar or other MRET approved technologies because it will be competing with and potentially displacing these technologies in the market place, not coal fired power.

3. The fuel for the power station is not “waste.” It is material that already has an economic value and it is bought and sold in the market place. Only a tiny amount is currently incinerated. Burning it as electricity gives it a higher value because of implicit subsidies³ available to it under the MRET scheme.
4. The greenhouse analysis highlights the arbitrariness of some current national and international conventions on measuring GHG emissions; e.g., deeming burning of biomass to be carbon neutral. The comparison between GHGs generated by current ways of disposing of wood “waste” as mulch and by the power station creates a nonsensical result. Mulching and composting add carbon to the soil but slowly decompose releasing some CO₂ over time. In burning, the entire product instantly becomes CO₂, and yet the (greater) emissions from the burning are not counted, while the (smaller) emissions from mulching are counted. Where is the logic in that?
5. The project is wasteful. 75% of the heat is “lost.”
6. Abatement Certificate Provider scheme. Eligibility (3-6) of the plant is unclear, especially with uncertainty surrounding the future of the Carbon Pollution Reduction Scheme. This should be clarified.
7. One of the claimed benefits of the project is “the generation of electricity from renewable biomass material in contrast to current practice which under-utilises a valuable resource,” Burning wood from native forest which has been industrially logged for woodchips is not a renewable technology. At least 180 years are needed for most of the forest to replace itself once it is logged intensively for woodchips.
8. “The supply of around 22 GWh of base load power annually to the electricity grid”; The Eden chipmill is an ideal site for alternative forms of renewable energy which could be generated more cheaply at this site using wind, solar or tidal technologies.

³ According to a study by MBAC Consulting “Global and Australian initiatives and impediments to the production of renewable energy from wood in Australia” May 2003, commissioned by the National Association of Forest Industries (NAFI), the maximum price payable for wood fuel under MRET is \$41.05/ t. Maximum price payable for wood fuel without MRET \$7.71/t. Thus the effective subsidy value of MRET \$33.33/t



The Guidelines for the EA are too narrow and fail to assess the broader environmental impacts of the native forest logging industry, especially the woodchipping practised in the Eden management area.

As residents of the far South Coast for the last 25 years it is very clear that the woodchipping industry completely misrepresents the nature of the wood resource it consumes. The logging trucks that enter the mill at Eden are not carrying heads and butts of trees. The logs on these trucks are not 'waste wood' as the industry's and government's media would suggest. Therefore the view that there is waste available to act as fuel for a forest furnace is based on a 'myth' promulgated by industry and the NSW Government. The definition of 'waste' in this whole debate is blurred. The proposed fuel is (according to the proposal) 'waste waste', as opposed to the 'waste' used as source for woodchips generally. There is a significant danger that this blurred edge between the two will be exploited by the industry when it can't sell its woodchips and wants to burn them instead.

Woodchipping is not sustainable and cannot be proven to be so. After woodchipping it takes around 180 years for the forest to relax itself. Current operations occur (or are projected to occur) at rotation times of 50-80 years. Therefore the resource obtained from such operations is not sustainable either. The Australian Forests Standard used as a determinant of sustainability is largely defunct, is not acceptable by some forest products buyers and is in the process of being relaxed by Forests Stewardship Council certification.

The EA fails to count all carbon in the fuel cycle. Woodchipping is one of the biggest Greenhouse Gas (GHG) emitters in Australia. The GHG's emitted during the harvest need to be counted as well as emissions caused by burning for electricity. If this is done, then it means that the GHG emissions from using woodchips as a fuel for electricity production is up to 6.4 times greater than that from a coal-fired power station.

The EA does not consider health impacts at all. We eat mussels produced in Twofold Bay and do not want additional anti-fouling treatments used for effluent water structure to contaminate our food. The power station would produce many different substances, including dioxins which are toxic to humans. There are particulate emissions which have not been considered in the EA to say nothing of the potential acid rain consequences of Sulphur Dioxide emissions - which are only acknowledged but not dealt with in the EA.

We use the Weatherzone website and were alarmed to see the following report recently that 'A climate and hydrology researcher says plans for a biomass power plant at Eden in the New South Wales South East will impact on the region's rain and snow falls. South East Fibre Exports plans to use chipmill timber waste to generate electricity in a 5.5 megawatt plant but the Victorian researcher, Aron Gingis, says the plant will have an adverse affect on air quality which will cause a decline in rainfall, affecting river flows and leading to an increased bushfire risk due to dry conditions.' We do not find this risk acceptable.

The local electricity providers (Country Energy) have stated that they will not buy MRET certificates for product from wood fired power stations. However, if the wood fired power station goes ahead how will consumers of green power elsewhere know whether their electricity is produced by burning forests or by other genuinely green methods such as solar or wind?

The proposal is not actually about green energy production but rather seeks to protect profits for a multinational overseas owned company already reaping the benefits from a heavily taxpayer subsidised industry. It's about ensuring sales for shareholders and existing local jobs which are diminishing in number due to technological changes. As such it represents the worst kind of greenwash in favour of big industry.

We moved to this region because of its natural beauty. It is anathema to us that our forests are woodchipped. It is totally unacceptable that woodchip product be used as fuel to provide electricity and a continuing market for this unsustainable product.

Name: Deb & Bob Harris

Organisation: Private

Address:

Possiwill

Kingfisher Rd

WYNDHAM 2550

IP Address: 033.a.002.syd.iprimus.net.au - 210.50.72.33

Submission for Job: #2914 Biomass-Fired Power Station

https://majorprojects.onhiive.com/index.pl?action=view_job&id=2914

Site: #1828 South East Fibre Exports 5 MW Biomass-Fired Power Station

https://majorprojects.onhiive.com/index.pl?action=view_site&id=1828



Submission from Yurangalo Inc

As a community conservation group working since the mid 90's for the protection for forests in the Eden region we totally oppose the Wood Fired Power Station Proposal by South East Fibre Exports.

The Guidelines for the EA are too narrow and fail to assess the broader environmental impacts of the native forest logging industry, especially the woodchipping practised in the Eden management area.

It is very clear that the woodchipping industry completely misrepresents the nature of the wood resource it consumes. The logging trucks that enter the mill at Eden are not carrying heads and butts of trees. The logs on these trucks are not 'waste wood' as the industry's and government's media would suggest. Therefore, the view that there is waste available to act as fuel for a forest furnace is based on a 'myth' promulgated by industry and the NSW Government.

The definition of 'waste' in this whole debate is blurred. The proposed fuel is, according to their proposal, 'waste waste', as opposed to the 'waste' used as source for woodchips generally. There is a significant danger that this blurred edge between the two will be exploited by the industry when it can't sell its woodchips and wants to burn them instead.

Yurangalo Inc does not want the local forests woodchipped. Woodchipping is not sustainable and cannot be proven to be so. After woodchipping it takes around 180 years for the forest to relace itself. Current operations occur (or are projected to occur) at rotation times of 50-80 years. Therefore, the resource obtained from such operations is not sustainable either. The Australian Forests Standard used as a determinant of sustainability is largely defunct, is not acceptable by some forest products buyers and is in the process of being relaced by Forest Stewardship Council certification.

The EA fails to count all carbon in the fuel cycle. Woodchipping is one of the biggest Greenhouse Gas (GHG) emitters in Australia. The GHG's emitted during the harvest need to be counted as well as emissions caused by burning for electricity. If this is done, then it means that the GHG emissions from using woodchips as a fuel for electricity production is up to 6.4 timed greater than that from a coal 'fired power station.

The local electricity providers (Country Energy) have stated that they will not buy MRET certificates for product from wood fired power stations. However, if the wood fired power station goes ahead, how will consumers of green power elsewhere know whether their electricity is produced by burning forests or by other genuinely green methods such as solar or wind?

The proposal is not actually about green energy production but rather seeks to protect profits for a multinational overseas owned company already reaping the benefits from a heavily taxpayer subsidised industry. It's about ensuring sales for shareholders and existing local jobs which are diminishing in number due to technological changes, As such it represents the worst kind of greenwash in favour of big industry.

The EA assumes the cleanliness of the fuel, yet the heavy metal load in the ash produced will be such that extra permissions are required to use it on a plantation site. Additional, SEFE CEO Peter Mitchell has already foreshadowed the use of local council sourced green waste as a possible fuel. Nothing will be known about the chemical loads of such fuels or the ash they produce.

The proposal has the potential to replace genuine MRET renewables such as wind and solar electricity. The NSW Government should be ensuring that industry concentrates on these. If SEFE was really concerned about being green rather than simply selling its product, then it has one of the best wind generation sites to be found locally owned land permitted for these purposes. We don't hear any proposals from them for such developments.

The community is aware of the myth of a sawlog driven industry. FNSW has indicated that 80% of the current proposed harvest in the Yurammie Special Prescription Zone (YSPZ) is non-sawlog timber. Yurangalo Inc and the other community groups working for the protection of the YSPZ do not regard this part of our catchment as 'waste wood', a product that South East Fibre Exports, a multinational corporation, can't sell and wants to burn for electricity.

Why should Eden benefit from electricity so produced while we already have to tolerate locally the environmental, hydrological and visual impacts of the logging practices that produce this unsustainable fuel?

Name: Debra Harris

Organisation: Yurangalo Inc

Address:

PO Box 9121

WYNDHAM 2550

IP Address: 033.a.002.syd.iprimus.net.au - 210.50.72.33

Anna Timbrell - Online Submission from [REDACTED] (object)

From:
To:
Date:
Subject:
CC:

Director of Infrastructure Projects

Department of Planning

Application No MP09_ 0034

Submission regarding the proposed wood fired power plant at eden chipmill

I understand that SEFE have put this project on hold as of the 22 march 2010.

This is an indicator of the international woodchip market , and as such demonstrates how dependant this proposal is on that market

The fuel for this proposal relies on the logging of over 18,000 hectares of native forest each year, to supply one million tonnes of trees for the eden chipmill

The proposal relies on the current woodchip industry operations being sustainable. This is highly contentious .

SEFE claims to meet AFS guidelines through a self regulatory process

since the operation of the chipmill began, hundreds of thousands of hectares of multi aged mixed species forest have been converted to single aged industrial thickets of silver top ash (the preferred chipping tree)

One wonders if SEFE is capable of meeting the guidelines , or if the guidelines are inadequate . In fact some japanese paper companies no longer recognize AFS as being an acceptable standard , a trend that will continue

SEFE's claim as sustainable is unacceptable

The EA ignores the carbon released in the logging process , yet the logging required to fuel this project will release millions of tons of carbon each year

Nor does the proposal count the emissions from transport and logging contractors

These emission need to be included , without which there would be no fuel.

In the case of native forests ,the claim that biomass power is carbon neutral is false.

It takes 80 to 150 years for the carbon released from the woodchipping operations (where the fuel comes from) to be sequestered back into the environment

Currently SEFE is operating on a rotation of ,at the most 25 years with some areas reharvested in as little as 5 years

this shortfall is enormous and the EA does not address this at all

Currently a large proportion of the material that this proposal would use as fuel, is sold as mulch.

This activity sequesters more carbon than the proposal. it also provides employment .

In conclusion this proposal should be rejected ,as it only has merit if the woodchipping industry continues and if none of the carbon released in supplying the fuel is counted

as It will recieve subsidy under the mret scheme it will take valuable funding from genuine renewables such as wind and solar

71
It should be noted that the [REDACTED] is an ideal position for wind generation, and if such technologies were adopted, a similar investment would achieve a much better environmental outcome, with a genuine reduction in carbon rather than a false reduction, based on "sweep it under the table" style accounting

I do not want my contact details to be given to the applicant

Regards [REDACTED]

IP Address: 112-213-152-225.bb.ispone.net.au - 112.213.152.225

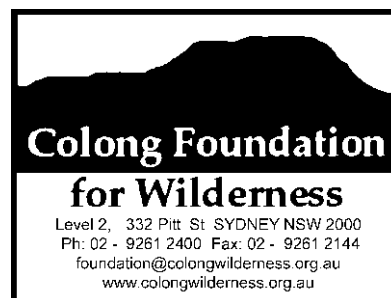
Submission for Job: #2914 Biomass-Fired Power Station
https://majorprojects.onhiive.com/index.pl?action=view_job&id=2914

Site: #1828 South East Fibre Exports 5 MW Biomass-Fired Power Station
https://majorprojects.onhiive.com/index.pl?action=view_site&id=1828

Anna Timbrell

E: anna.timbrell@planning.nsw.gov.au

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Thursday 19th April, 2010

Anna Timbrell
Environmental Planning Officer
Infrastructure Projects
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Dear Sir/Madam,

Submission as an objection to Application Number MP09_0034
Proposed biomass-fired power station at the Eden woodchip export facility

South East Fibre Exports proposal for a 5.5MW wood-fired power station (MP 09 0034) located at the Eden woodchip mill site that would burn about 57,700 tonnes of wood, primarily from native forests should be refused development consent. The environmental assessment processes for this precedent setting do not adequately address the impacts of the proposed power plant, or the broader issues related to sustainability.

The Environmental Assessment assumes that the Eden Regional Forest Agreement and Integrated Forestry Operations Approval relieve South East Fibre Exports from the obligations of considering the impacts of its proposed power plant activities on forests. This assumption rests on the use of “forests waste” in the Regional Forest Agreement, but it is a moot point as to whether this activity is in any way captured by this “forest waste” definition. If the contention of the applicant is correct, then as much of the trees logged in native forests in the Eden RFA are classified as “waste” and can be used for bioenergy. Such a RFA definition of waste [REDACTED] as native forests do not produce waste. Live and dead trees are habitat, they are also food for other species and decompose to condition the soil, and they produce zero waste.

The proposed ‘waste’ stream that is to be used in this proposed power plant is a legal fiction. The unused wood (congealed carbon dioxide) should be stored where it does the most good, in the living forests, where it serves ecological functions, stores carbon, and reduces soil erosion and depletion.

Logging “waste” if left in the forest continues to store greenhouse gases for decades and improves soil fertility for the regrowth forest. When burned for power it becomes carbon dioxide instantly. Recent research has revealed that native forests store vastly more carbon than previously supposed.

When the woodchipping industry began in the 1970s, it was claimed to utilise the “waste” from logging. History has proven that a [REDACTED], as up to 90% of logging product has ended up as woodchip. Native forests should not by some asinine legal fiction be deemed to produce “waste”. Forests actually store mega-tonnes of carbon, yield giga-litres of freshwater and provide secure habitat for our native forest wildlife.

Decisions based on false presumptions have a habit haunting Parliaments for generations. The lessons of the past are there to be learnt, and this proposal should be refused consent

██████████ The proposed power plant consumes not waste but valuable forest resources.

It is a certainty that the proposed power plant will use logs, not just the hard to collect bits and pieces; such as head logs and butt logs. It will burn easy to handle tree boles, nicely cut to size, including those forest types not currently used because they are too hard or too red for use in woodchipping operations.

This new additional logging will have an adverse additional impact and could not be carbon neutral. This new market (burning forests for electricity) will subsidise the destruction of forest types previously considered non-commercial and intensify logging operations in the Eden and East Gippsland Regions.

The removal of native forest biomass, particularly through woodchipping operations, significantly depletes the carbon sequestered in and under native forests. It is no accident that the existing definition of renewable energy specifically excludes native forest harvesting residue.

Logging of native forest biomass could never be considered a source of “renewable” energy. Even accounting for forest regrowth, wood-fired power plants release far more carbon into the atmosphere per kilowatt hour than coal-fired plants. Wood is a low carbon density fuel, and when compared with coal. It is many times less carbon efficient per unit energy generated with only 25 per cent of the heat generated being turned into energy, or so the applicant claims.

The actual efficiency of wood-fired plants is around 9.5 per cent according to the Forest Products Association data, and this compares with fifty percent generation efficiency associated with the best gas fired power plants. Further, there is a net loss of carbon from the forest as the woodchip logging cycle is less than half that of the 80 or more years required for the carbon stores to be returned to the forest.

Native forestry biomass could, ██████████, undermine Australia’s efforts toward meeting its renewable target through the genuine renewable energy sources, like solar and wind.

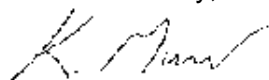
It would also mean the government could forego greater economic returns if it allowed managed native forests to regrow and the additional sequestered carbon in them to be traded in the new carbon economy, if we are to become in any way sustainable as a society.

In addition the air pollution impacts that proposed power plant will generate have not been adequately assessed, including on human health. The small size of the plant will make it economically unviable to install modern air pollution control and efficiency technologies. It will be a cheap and dirty power plant, possibly impacting on the local community’s health.

It will also discharge large amounts of hot water into Two Fold Bay, impacting on the Bay’s delicate ecology, which includes turtles and leafy sea dragons.

Thank you for the opportunity to make a submission.

Yours sincerely,



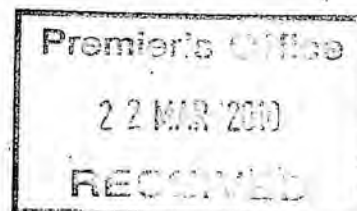
Keith Muir
Director

FN	
LN	2010/1982

Don't Burn Forests for Electricity Coalition

Monday 22nd March, 2010

The Hon Kristina Keneally
Premier of NSW
Level 40
Governor Macquarie Tower
1 Farrer Place
SYDNEY NSW 2000



Dear Premier Keneally,

Don't burn forests for electricity

Environment groups and forward thinking electricity suppliers (see list attached) oppose the burning of native forest biomass for electricity generation. The NSW definition of renewable energy that excludes native forest harvesting residue should be retained and the proposed wood-fired power plant for the Eden woodchip mill should be rejected.

Due to public concerns, energy retailers will not purchase native forest wood "waste" Renewable Energy Certificates (RECS). Issuing RECs from burning native forests would become a public relations disaster for the renewable energy industry.

Energy distribution companies don't want power from forest biomass. The limited amount of RECs should not be taken up by unacceptable native forest biomass sources but should go instead to solar and wind generation.

The NSW Government should safeguard the reputation of their renewable energy policy by rejecting plans to burn native forests biomass for electricity.

South East Fibre Exports proposes a 5.5MW wood-fired power station located at the Eden woodchip mill site that would burn about 57,700 tonnes of wood, primarily from native forests. Conservationists have no confidence in the planning process for this precedent setting proposal. The environmental assessment does not adequately address the impacts of the proposed power plant, or the broader issues related to sustainability and the carbon economy, such as the loss of native forest biomass.

Logging "waste" if left in the forest continues to store greenhouse gases for decades and improves soil fertility for the regrowth forest. When burned for power it

becomes carbon dioxide instantly. Recent research has revealed that native forests store vastly more carbon than previously supposed.

Logging of native forest biomass could never be considered a source of "renewable" energy. Even accounting for forest regrowth, wood-fired power plants release far more carbon into the atmosphere per kilowatt hour than coal-fired plants. The removal of native forest biomass, particularly through woodchipping operations, significantly depletes the carbon sequestered in and under native forests.

Native forestry biomass would undermine Australia's efforts toward meeting its renewable target through genuine renewable energy sources, like solar and wind. It would also mean the government could forego greater economic returns if it allowed managed native forests to regrow and the additional sequestered carbon in them to be traded in the new carbon economy.

When the woodchipping industry began in the 1970s, it was claimed to utilise the "waste" from logging. History has proven that a [REDACTED], as up to 90% of logging product has ended up as woodchip. Native forests should not produce "waste", but store mega-tonnes of carbon, yield giga-litres of freshwater and provide secure habitat for our native forest wildlife.

The proposed biomass power plant at the Eden woodchip export facility (MP 09 0034) should be refused development consent.

Yours sincerely



Keith Muir
for the groups

Mail to: The Colong Foundation for Wilderness, 2/332 Pitt St, Sydney, NSW, 2000.

19/02/2018 14:07 0292612144 CULUNG PAGE 03/03

**Community groups and energy retailers opposed to the burning of
native forest biomass for electricity generation**

Environment Groups:

Colong Foundation for Wilderness
The Wilderness Society
Total Environment Centre
Chipstop
ChipBusters
Nature Conservation Council of NSW
Climate Centre (Victoria)
Forestmedia
ParraCan
450ppm
Friends of the Earth
South East Region Conservation Alliance

Retailers committed in NSW:

AGL
Country Energy
Origin
Australian Power and Gas

Retailers committed in Vic:

Country Energy
Energy Australia
Red Energy
Origin Energy
Simply Energy
Victoria Electricity

I am opposed to the granting of consent to SEFE for their native forest wood powered electricity generator.

The main reason for my opposition is because the plant would depend upon the continued woodchipping of native forests. Although promoted as residue, the major source of the plant fuel would be the million tons of native forest trees woodchipped annually.

Woodchipping native forests is driving forest management for 100s of km round the woodchipmill from East Gippsland to Ulladulla and inland to the escarpment and the Great Divide.

The intensive logging of native forests to supply woodchips is driven by the commercial incentive to maximise the amount of fibre that can be extracted from native forests. This reduces the age and diversity of trees, massively disturbs forest soils, compromises water catchment qualities and kills native animals particularly those dependent on tree hollows. It also significantly reduced the massive quantities of carbon stored in undisturbed native forests. This proposal would help entrench the industry which causes these destructive consequences.

By qualifying as “renewable” energy for the purposes of MRET, the proposal would also displace alternative forms of genuine renewable energy such as wind, solar and geothermal.

Even if it is compared with coal fired power, if the full life cycle of the fuel is assessed, wood fired power is over five times more greenhouse intensive than coal fired power because of the inefficiencies of the proposed plant in converting wood to electricity and because of the carbon dioxide emissions which are caused by intensive logging of native forests.

I note the Department’s approval process supposedly requires consideration of upstream and downstream emissions caused by the proposal. But the EA fails to address the carbon emission consequences of native forest logging. It ought to. It is not sufficient to pretend that those emissions should be slated home to the native forest managers when this company is the major customer of those suppliers and its demand really dictates native forest management practices.

I suppose it is no surprise that an EA commissioned by the proponent highlights or exaggerates positive aspects of the proposal and ignores or neglects negative aspects. Similarly, consideration of the existing use of the fuel source which is mainly now sold as landscape mulch details transport issues and methane but ignores carbon returned to the soil by such applications.

The EA claims that “no native or plantation forest would be felled for the purpose of fuelling the plant”. However, Forests NSW expects that some timbers which are not currently used for woodchipping because they are either too red or too hard, and are not of sawlog quality will be used for power generation. And this so called residue adds to the sorry history of the woodchip plant which was established ostensibly to help support the sawmilling industry by providing an economic return to that part of the forest not useful for sawmilling. Yet since its establishment 40 years ago

woodchipping has steadily increased its share of native forest product and in the Eden region it is now over 90% of the end product and the number of sawmills in the region has steadily decreased.

If the proposal were to be approved (and given the capture of the bureaucracy and government by the native forest industry lobby, this process may be perceived as a smokescreen pretending consultation and I question whether this consent process is any more than a rubber stamp) then one of the conditions of consent should be to make the plant mobile so that some time in the future (when native forest woodchipping stops or is disqualified as eligible for renewable subsidies) the technology can be moved to existing plantations to use that wood source.

One requirement from the proponent that should be an undertaking that no claim would be made by it against any future Government decision to remove access to the native forest resource for woodchipping or the denial of access to “renewable” energy subsidies because the probability of that happening should be part of the commercial risk of the project to be assessed and borne by the proponent.

I noted recent comments on ABC radio by the SEFE corporate affairs manager that the project was on hold because of market realities. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

In a presentation to the Bega Valley Shire Council last year I heard the SEFE general manager spruik this project highlighting the woodchips which are currently burnt on site because they can't be sold (less than 2% of the total proposed fuel source) and the plantation sources of the fuel. The extent of plantation would on the chipmill's own most optimistic projections be less than 40% and as Mr Mitchell acknowledged in a subsequent consultation with me at the Bega Clean Energy Expo (!) that proportion would depend on whatever is going through the woodchipmill which over the last 3 years has been well over 90% native forest.

Were the project to proceed, I am also concerned about the consequences for the marine environment of the emissions into Twofold Bay of hot water and the anti-foulants in that water and believe the regulation of that pollution should be more stringent.

Similarly the EA assessment of the airborne emissions of noxious gases, smells, and particulates of various sizes especially those most damaging to human health needs tightening so that the health and environmental amenity of Eden, Boydtown and Kiah residents isn't compromised.

Finally, I recently heard the scientist Aron Gingis talking on ABC radio about the consequences for rainfall both locally and regionally if this wood fired power proposal were to proceed. This issue was not addressed by the EA and I think a further study of Aron Gingis' thesis should be undertaken before any consent is granted.

Councillor Keith Hughes
Bega Valley Shire Council

19 April 2010

Rachel Berry

From: Heather Kenway [nkenway@bigpond.net.au]
Posted At: Friday, 30 April 2010 2:38 PM
Conversation: Major project proposal: Eden wood-fired power station
Posted To: RO_Office_Enquiries
Subject: Major project proposal: Eden wood-fired power station



South East Region Conservation Alliance

www.serca.org.au
 sercansw@gmail.com
 PO Box 724 Narooma NSW 2546 AUSTRALIA



To the Premier, Ministers and Members of the NSW Parliament

South East Fibre Exports (SEFE), the Eden export woodchip mill, is seeking approval to build a power station to be fuelled by 'wastes' from its operations - woodchipping for export native forest logs supplied by NSW and Victorian forestry agencies. It has provided an Environment Assessment (EA) of the proposal.

The South East Region Conservation Alliance (SERCA) is strongly opposed to the proposal. It considers the EA seriously deficient.

SERCA is urging Ministers and Members of Parliament to consider the following and reject the proposal:

- We will pay a huge environmental price for this power. It will depend on decades more of near clear-felling larger and larger areas of native forest, with up to 95% of logs woodchipped. Huge loss of plants, wildlife and soils, loss of diverse forest types already seriously damaged, loss of valuable carbon, water and biodiversity stocks, and siltation of waterways. Plus avoidable damage to unique Aboriginal cultural traditions and heritage sites.
- It will produce higher carbon emissions than coal-based electricity, when full account is taken of the logging and woodchipping that provide its fuel source. It is not clean, green or renewable energy, and energy retailers won't touch it.
- This is a test case for many other native forest based power proposals. What forests will be left if this proposal and others are approved?
- Australia's domestic and export wood needs could be entirely plantation-based given our now plentiful plantation supplies.
- Surely the profits of two foreign owned companies (Nippon Paper and Itochu) are not more important than the water supplies and the health of the residents of the region.
- Nor are those profits more important than the other regional industries that are and will be damaged by this forestry industry for decades if the proposal succeeds – especially tourism, oyster-growing and other food production, and genuinely renewable alternative energy supplies like solar and wind power,

- The NSW Auditor-General has confirmed Forests NSW has on-going and rising losses on its native forest operations. The NSW Government is now massively subsidising the chipmill's operations through disgracefully low log prices (\$6. to \$14 a tonne depending on distance from the chipmill). Over the life of a power plant the losses on operations alone would be hundreds of millions of dollars.

You won't find these issues discussed in SEFE's Environment Assessment.

They are vitally important to this region and its growing and changing, well-educated population. They are also of great concern to people in other parts of Australia. Already SERCA and its member organisations have collected several thousand submissions and messages protesting against the proposal and the woodchipping that underpins it..

People are aware that native forest logging and woodchipping are dying industries, unpopular at home and producing products increasingly unwanted by overseas customers. Australia doesn't need this kind of energy. The region has a good future without the chipmill or its proposed power station. Other industries, including processing based on softwood plantations, already provide most of its economic and employment growth. The region is actively interested in genuinely renewable energy developments like solar and wind power, and has a high uptake of solar installations.

This region can't be Australia's Coastal Wilderness - as the Commonwealth Government's tourism promotion describes it - without healthy natural native forests, and it is losing them at an alarming rate. Conserving and regenerating them as carbon, water and biodiversity stores can create a whole new range of regional educational, economic and employment opportunities.

SERCA urges you to oppose the SEFE proposal.

Keith Hughes

Convenor South East Region conservation Alliance

29 April 2010

Anna Timbrell - Online Submission from [REDACTED] (object)

From [REDACTED]
To:
Date
Subj
CC:

To whom it may concern,
I strongly object to the proposed bio-mass fired power station in Eden.

I believe that the environmental assessment provided by SEFE fails to take into consideration any off-site impacts related to the harvesting of fuel. These impacts include but are not limited to;
disruptive clear-fell harvesting of native forest,
subsequent afterburning of harvested area and the resulting co2 implications,
a reduction in bio-diversity,
loss of habitat for threatened, endangered and common plants and animals,
terrestrial and riparian erosion,
siltation of waterways,
reduction of water quality and quantity in effected catchments.

I firmly believe the practice of felling native forests for wood chips is morally, financially, environmentally, and socially unjust, especially when considering the causes and effects of climate change on future generations.

The basis of using 'waste' for fuel is fundamentally flawed as without wood-chipping there would be no waste. In a standing forest there is no waste. There is extensive value in the form of habitat, healthy water catchment, cleaner air and long term natural carbon capture and storage.

I am concerned about the proposed long term supply of native forest waste for fuel. I am under the understanding that the Current RFA guarantees the timber industry access to a certain tonnage of timber for harvesting per annum. I understand that this allocation literally will not exist in the next ten years. I question where the fuel to fire this power station will be sourced.

I solemnly urge you not to approve the proposed Bio-mass fired power station,
In the name of and for the sake of my Children and Grand-children,
Luke Hamilton

note: Please do not provide my personal details to the Proponent of this proposal or any other party

2.1 [REDACTED] 58.168.79.82

Submission for Job: #2914 Biomass-Fired Power Station
https://majorprojects.onhlive.com/index.pl?action=view_job&id=2914

Site: #1828 South East Fibre Exports 5 MW Biomass-Fired Power Station
https://majorprojects.onhlive.com/index.pl?action=view_site&id=1828



Dear Sir/Madam

I would like to inform you about my objection to the Biomass-Fired Power Station at the Chip Mill in Eden NSW. Under the current RFA (Regional Forest Agreement) 90-95% of timber harvested between Nowra and Orbost are classified as waste wood and end up at the wood chip mill in Eden. Since the opening of the mill in 1971 the quality of our native forests has rapidly declined. It shows clearly that the RFA failed and is not working to sustain the forests ecology.

Using classified waste wood in the Biomass-Fired Power Station would further decline the so much needed forests. As living forests are the best known carbon absorber on the planet. The benefit of forests will reduce much more carbon emission than the the 21000t saved with the power plant.

Also the site where the Eden chip mill operates has superior wind and wave power opportunities. A way of investing in real clean power.

regards

Bruno Hofstetter

Name: Hofstetter Bruno
Organisation: Electrical Contractor

Address:
PoBox 923
Bega NSW 2550

IP Address: c-59-101-76-23.syd.connect.net.au - 59.101.76.23

Submission for Job: #2914 Biomass-Fired Power Station
https://majorprojects.onhiive.com/index.pl?action=view_job&id=2914

Site: #1828 South East Fibre Exports 5 MW Biomass-Fired Power Station
https://majorprojects.onhiive.com/index.pl?action=view_site&id=1828

Anna Timbrell

E: anna.timbrell@planning.nsw.gov.au





What a ludicrous assumption.Poor economic theory screws environment again.How could the proposed plant generate less greenhouse gas!!? Also while acknowledging the expulsion of deadly dioxins,furans and HAPs, no research regarding human health implications from these emissions has been done! My other considerable concern is the total dismissal of, and impact on the fragile biodiversity of Twofold Bay. This EA is not worth the paper it's written on and shows little concern about environment,biodiversity,climate change and people of the far South Coast. This project should be stopped immediately!

Name: Greg Dive

Address:
P.O. Box 65
Thirroul
NSW 2515

IP Address: 107.198.191.203.static.nsw.chariot.net.au - 203.191.198.107

Submission for Job: #2914 Biomass-Fired Power Station
https://majorprojects.onhiive.com/index.pl?action=view_job&id=2914

Site: #1828 South East Fibre Exports 5 MW Biomass-Fired Power Station
https://majorprojects.onhiive.com/index.pl?action=view_site&id=1828

Anna Timbrell

E: anna.timbrell@planning.nsw.gov.au





1. Electricity generated from native forest wood fired power is even more GHG intensive than coal.
2. In assessing greenhouse implications and calculating avoided emissions this power should be compared with wind or solar or other MRET approved technologies because it will be competing with and potentially displacing these technologies in the market place, not coal fired power.
3. The fuel for the power station is not waste. It is material that already has an economic value and it is bought and sold in the market place. Only a tiny amount is currently incinerated. Burning it as electricity gives it a higher value because of implicit subsidies available to it under the MRET scheme.
4. The greenhouse analysis highlights the arbitrariness of some current national and international conventions on measuring GHG emissions; e.g., deeming burning of biomass to be carbon neutral. The comparison between GHGs generated by current ways of disposing of wood waste as mulch and by the power station creates a nonsensical result. Mulching and composting add carbon to the soil but slowly decompose releasing some CO2 over time. In burning, the entire product instantly becomes CO2, and yet the (greater) emissions from the burning are not counted, while the (smaller) emissions from mulching are counted. Where is the logic in that?
1. The project is wasteful. 75% of the heat is lost.
2. Abatement Certificate Provider scheme. Eligibility (3-6) of the plant is unclear, especially with uncertainty surrounding the future of the Carbon Pollution Reduction Scheme. This should be clarified.
3. One of the claimed benefits of the project is the generation of electricity from renewable biomass material in contrast to current practice which under-utilises a valuable resource. Burning wood from native forest which has been industrially logged for woodchips is not a renewable technology. At least 180 years are needed for most of the forest to replace itself once it is logged intensively for woodchips.
4. The supply of around 22 GWh of base load power annually to the electricity grid; The Eden chipmill is an ideal site for alternative forms of renewable energy which could be generated more cheaply at this site using wind, solar or tidal technologies.

Name: Patricia Dive

Address:
PO Box 65
Thirroul 2515

IP Address: 107.198.191.203.static.nsw.chariot.net.au - 203.191.198.107

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Anna Timbrell

E: anna.timbrell@planning.nsw.gov.au



Unit
Melbourne,

Ms Melody Shotade
5/101 Thornbury
Vic, 3071

Dear Officer Timbrell,

My purpose for writing is to express that I am deeply concerned, with the chosen strategic proposal in favor a biomass electricity plant in Eden.

I hope by writing this letter you may understand for many a good reason, the consequence that may occur across the board if you to agree to such an action.

I recognise that there is a dollar fixture to this cause; as I am aware that natural resources are predominant and necessary part of our economy. Irrespective of this fact I'd like to ask you will you be helping the economy for the now, or for long term.

If you answered both then I beg to differ. Firstly, were you aware that logging our preserved crown land is an assured death trap many ways? Why consider this as an economically sound decision? When the nation is planning to reduce its carbon admissions, I assure you this won't look got for your states portfolio.

According to Urban Ecology Australia's website, logging an old growth such as that of Mum bulla State forest will exclude you from the protection of a carbon neutral scheme. If the infrastructure is not environmentally sound. Ex. Transportation and excess heat are not correctly and strategically minimized or conserved who will foot that bill.

Then there is the question, who will own this industry belong to? Is the acquisition going to be just another dollar sign for state turn over? What I'm about to ask is Clichéd I know, but here it is. Why is there a proposal to sell such a Beautiful Iconic forest such as Mum bulla? I ask can you imagine what the reaction around the globe if the world were to know exactly, what lies a head, koala species?

In terms of reserved areas within the logging coops and reserves placed water ways I believe this is no reason to be complacent. This sort of situation is dismal for everyone including the public. Clearing old forest growth is like a war, where there is a loss of habitat/homes (Mum bulla) and animals have to relocate in another environment, and usually follow the water course and end up in urban areas due to shortage of food and shelter. An example in the state of Victoria is the bat epidemic and also migration of the rainbow Lorikeets. Koalas as I'm sure are aware, don't migrate well and are endangered list.

I strongly do not believe this project. It is pivotal that this project is reconsidered, reinvested. Would it not be a wise opt for sustainable, renewable, and recoverable energy such as that of plantation harvesting? Especially in an age in which we are trying to promote a system of lasting sustainability, for not only your state but for the national interest of our country.

Investing in this market would encourage a stable market for lasting employment; it could possibly lead to multiple work forces within that industry rather than just the one in plant in Eden. Investing in biomass timber plantations would certainly create wealth and less complication for the State.

Finally investing in this area will see real, simple and effective social, economic and environmental precautions are most certainly met in this area. Protecting what has been already identified (Mum bulla) as a preserved area, will see that this forest, this land, keep I line with a reputation for tourism and for cultural, historic and natural biodiversity value. I would not like such a place of interest destroyed for good, it would be a waste.

Thank you,
Kindly,
Melody Shotade

Submission by [REDACTED]
(Please withhold my name and address when providing submissions to SEFE)

Biomass-Fired Power Station Major Project Application 09_0034

Thank you for the opportunity to provide a submission on the Eden woodchip furnace proposal by SEFE. I firmly believe it should be refused as approval would lock in a fuel source of native forest wood, and pre-empt any decision by future governments on the extension/or not of Regional Forest Agreements.

I believe there should be no decision to approve this proposal until the vital importance of conserving native forests has been addressed in Commonwealth and NSW Government climate change and water policies. This would include a full governmental and public reconsideration of outdated forestry policies and unsustainable forestry practices that underpin the RFA regime.

I oppose this proposal for the following reasons:

General

1. The chipmill announced on 22 March 2010 that this project is "on hold," before it has even been approved. The Minister should therefore reject it or if approved impose a condition that if no commencement has occurred within 6 months, the approval should lapse. Its status as "on hold" reflects the state of the international woodchip market and demonstrates how dependent it is on that market.
2. The fuel to be used is not "waste" and would not exist if one million tonnes of trees (almost 19,000 hectares of forest) were not logged each year to supply the chipmill.
3. The existing use of the proposed fuel generates substantially less greenhouse gas than the proposed power station because, as mulch, it decomposes slowly and transfers significant carbon to the soil.
4. The scope of this assessment is so narrowly defined as to make it almost meaningless. It examines in minute detail some aspects but ignores the bigger context. For example, it refers to the "terrestrial ecology" of the site as having "a disturbed under storey of exotic grasses", in other words, mown lawn, but totally ignores the immense ecological implications of intensive, industrial scale logging required to supply the fuel.
5. While acknowledging that deadly dioxins, furans and HAPs will be emitted, the EA does not examine the human health implications of the emissions at all.

Care for the natural environment

1. Very hot water will be discharged into Twofold Bay. The temperature of cooling water discharged into Twofold Bay will be more than 21 degrees above the ambient water temperature in the winter. The implications of this are dismissed, but there are some serious consequences:

- a. The Weedy Sea Dragon (8-21), a threatened species, can only survive in temperatures less than 22 degrees. The EA says that the sea dragons will go somewhere else: they "may avoid the area around the outlet." Too bad for them if they don't.
 - b. Green Sea Turtles. The presence of these creatures is noted but the report fails to mention that in other power stations in NSW, turtles are regularly trapped in cooling water pipes because they are attracted by the warmer temperature.
 - c. Whales. Noise may interfere with whale migrations via Twofold Bay (8-10)
 - d. Anti-fouling treatments (8-17). Toxic treatments may threaten marine life and mussel culture.
2. Emissions estimates, especially in relation to particulates and heavy metals assume that the wood will be clean and uncontaminated and no consideration is made for its exposure to salt.
- a. SEFE CEO Peter Mitchell explicitly told the Bega Valley Shire council on 26 August 2008 that "municipal waste" was a potential fuel.
 - b. The stockpile of fuel will be stored a few meters from the ocean where it will be contaminated by salt, increasing dioxin levels.
 - c. Heavy metal content in ash will exceed allowable limits and additional approval from DECC will be required to use it on the SEFE Rockton plantation. Exposure to heavy metals has been linked to penis defects. <http://www.smh.com.au/lifestyle/wellbeing/heavy-metals-raise-risk-of-penis-defects-20091202-k6es.html>
 - d. A Canadian study commissioned the government of British Columbia (Canada) last year. "Emissions from Wood-Fired Combustion Equipment"
http://www.env.gov.bc.ca/epd/industrial/pulp_paper_lumber/pdf/emissions_report_08.pdf found that basic emissions which could be expected include:
 Acetaldehyde Alpha-pinene Beta-pinene Carbon monoxide (CO) Formaldehyde Methanol Naphthalene Toluene Total phenols Turpentine 2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD) C/P 2,3,7,8-Tetrachlorodibenzo-p-furan C/ Hydrogen sulphide C/S Nitrogen oxides (NOx) Beryllium Cadmium and compounds Chromium (II) compounds, as Cr Chromium (III) compounds, Cr Chromium (metal) Chromium (total) Chromium, hexavalent metal and compounds Cobalt as Co metal Dust and fume Cobalt carbonyl as Co Copper, Dusts and mists, as Cu3 Copper, Fume Iron Lead arsenate, as Pb3 (As2O4) Lead chromate, as Cr Lead compounds Magnesium Manganese Molybdenum Nickel and compounds Particulate matter (PM) Phosphorus Selenium Silver Thallium Zinc Arsenic and inorganic arsenic compounds Mercury Hydrochloric acid Sulphuric acid Sulphur dioxide (SO2)

Climate change concerns

1. Electricity generated from native forest wood is more greenhouse intensive than coal fired power.

2. It will compete with and potentially displace genuine renewables permitted under the Mandatory Renewable Energy Target MRET scheme. It will not be competing with coal.
3. The project depends for its fuel on the continued existence of the native forest woodchipping industry, one of Australia's biggest greenhouse polluters.
4. The EA does not look at the full life cycle of the fuel (i.e. it ignores the greenhouse impacts of native forest logging; it simply asserts this is "sustainable because it has Australian Forestry Standard (AFS) certification). It fails to examine the consequences of the one million tonnes of woodchipping each year, without which there would be no fuel.
5. It claims: "Improved environmental outcomes due to lower greenhouse gas emissions per unit of output compared to conventional coal-fired power generation technologies. The proposed plant would potentially avoid the emission of 23,800 t Of CO₂-e from fossil-fuel based power generation per year."

Logging of native forests to supply the Eden chipmill has been conservatively estimated at over 18 million tonnes per year¹ with one estimate as high as 61 million and another as low as 9 million tonnes. Logging emissions must be counted in assessing the GHG implications of burning native forest wood for electricity. It is simply not valid to start counting at the furnace door; the whole life cycle of the fuel must be taken into account in measuring greenhouse impacts. When power generated from native forest is compared with coal fired power, if the full life cycle of the fuel is assessed, wood fired power is as much as 6.4 times more greenhouse intensive than coal fired power².

¹ Carbon pollution generated by logging for the Eden chipmill

According to Mackey et al "Green Carbon" 2008, the average carbon carrying capacity for all the SE Australia eucalypt forests is 640 tonnes per hectare. In those forests in SE NSW where the actual carbon stored is currently less than the carrying capacity, this is entirely due to the previous operations of the Eden chipmill over the past 40 years, so it is valid to use Mackey's figure of 640.

According to FOI information, in 2006-07 FNSW logged 14,388 hectares in the Eden, South Coast/Southern and Tumut areas.

The figures below do not include the emissions from running the mill, and transport associated with logging contractors or deliveries to the mill. The calculation is based on:

Area logged x Carbon stock per ha x 40% (loss from logging) x 3.666 (converting C to CO₂)

Thus, for NSW:

14,388 x 640 x .4 x 3.666 = 13,503,080 tonnes of CO₂

For East Gippsland:

4,500 x 700 x .4 x 3.666 = 4,611,600 tonnes

Total: 18,114,680 tonnes.

40% of the carbon stored in a forest is lost to the atmosphere when it is logged, even after 150 years. The weight of a carbon dioxide molecule is 3.666 times the weight of a carbon atom. Approx hectares logged in East Gippsland in 2007.

² Dr John Kaye MLC. Adjournment Speech 2 December 2008 "Our very rough analysis, based on forestry industry and peer-reviewed data, suggests that for every megawatt hour of energy generated by south-east native forestry biomass, more than 6.4 tonnes of CO₂ would be released instantaneously. This is more than **6.4 times the amount of CO₂ released from burning coal to produce the same amount of energy.** Certainly regrowth would bio-sequester some of this carbon but at a very slow rate. It would take about 80 years of regrowth to capture 5.4 tonnes, thus returning the greenhouse gas emissions to the same level as coal." <http://www.john.greens.org.au/media/adjournment-speech-eden-chipmill-and-green-power>

Woodchipping

1. Without ongoing woodchipping of a million tonnes of native forest a year, there would be no fuel available.
2. Sustainability of native forest logging. No serious attempt is made to assess this. It is simply deemed "sustainable" because most SEFE chips are certified under the highly controversial AFS. Japanese paper manufacturers are increasingly reluctant to accept AFS as an adequate label of sustainability and the biggest paper manufacturing company in Japan, Oji, does not accept it.
3. The EA claims "Improved environmental outcomes due to lower greenhouse gas emissions per unit of output compared to conventional coal-fired power generation technologies. The proposed plant would potentially avoid the emission of 23,800 t Of CO₂-e from fossil-fuel based power generation year." See point 4 under "If you are concerned about climate change."

All emissions from logging should be counted in assessing the GHG implications of burning native forest wood for electricity. It is simply not valid to start counting at the furnace door; the whole life cycle of the fuel must be taken into account in measuring greenhouse impacts. GHG emissions from the proposed plant should be compared with those of other MRET approved technologies, not with coal fired power.

4. However, even if it is compared with coal fired power, if the full life cycle of the fuel is assessed, wood fired power is possibly 6.4 times more greenhouse intensive than coal fired power. It is claimed that "no native or plantation forest would be felled for the purpose of fuelling the plant" (19-3). Forests NSW expects that some timbers which are not currently used for woodchipping because they are either too red or too hard, and are not of sawlog quality will be used for power generation.

Impact on Eden and nearby areas

1. While acknowledging that deadly dioxins, furans and HAPs will be emitted, the EA again does not examine the human health implications of the emissions at all.
2. Emissions estimates, especially in relation to particulates and heavy metals assume that the wood will be clean and uncontaminated and no allowance is made for its exposure to salt.
 - (a). SEFE CEO Peter Mitchell explicitly told the Bega Valley Shire council on 26 August 2008 that "municipal waste" was a potential fuel.
 - (b). The stockpile of fuel will be stored a few meters from the ocean and will be contaminated by salt, increasing dioxin levels.
3. It will not "improve the reliability of the local electricity supply." (19-2) In 2009, the Eden chipmill was closed for weeks at a time, for most of the year it was on a 4 day week. If Eden residents were counting on it to power their homes in 2009, they would have experienced many outages.

4. Emissions inventory states that "most of the particulate matter will be controlled," especially particulates of greater size. There is no examination of the nature, volume and consequences of particulates bigger than 10 microns. There is no justification provided for ignoring them. The EA leaves open the possibility that some of these bigger particulates will be emitted, but fails to provide any detail of the nature, volume and consequences of those emissions.
5. Odour. While it is acknowledged that sulphur dioxide, rotten egg gas will be generated, there is no consideration of odour as an issue to be addressed. Neither are the acid rain consequences of sulphur dioxide emissions addressed.
6. Bega Valley Shire Council Zoning. The chipmill site is currently zoned 1 (A) agricultural, arguably not appropriate for this type of development.
7. Recreational divers will have reduced access to the chipmill jetty (8-23)
8. Anti-fouling treatments (8-17). Toxic treatments may threaten marine life and mussel culture.

Renewable energy generation and use

1. Electricity generated from native forest wood fired power is even more GHG intensive than coal.
2. In assessing greenhouse implications and calculating "avoided emissions" this power should be compared with wind or solar or other MRET approved technologies because it will be competing with and potentially displacing these technologies in the market place, not coal fired power.
3. Again the fuel for the power station is not "waste." It is material that already has an economic value and it is bought and sold in the market place. Only a tiny amount is currently incinerated. Burning it as electricity gives it a higher value because of implicit subsidies³ available to it under the MRET scheme.
4. The greenhouse analysis highlights the arbitrariness of some current national and international conventions on measuring GHG emissions; e.g., deeming burning of biomass to be carbon neutral. The comparison between GHGs generated by current ways of disposing of wood "waste" as mulch and by the power station creates a nonsensical result. Mulching and composting add carbon the soil but slowly decompose releasing some CO₂ over time. In burning, the entire product instantly becomes CO₂, and yet the (greater) emissions from the burning are not counted, while the (smaller) emissions from mulching are counted. Where is the logic in that?
5. The project is wasteful. 75% of the heat is "lost."
6. Abatement Certificate Provider scheme. Eligibility (3-6) of the plant is unclear, especially with uncertainty surrounding the future of the Carbon Pollution Reduction Scheme. This should be clarified.

³ According to a study by MBAC Consulting "Global and Australian initiatives and impediments to the production of renewable energy from wood in Australia" May 2003, commissioned by the National Association of Forest Industries (NAFI), the maximum price payable for wood fuel under MRET is \$41.05/ t. Maximum price payable for wood fuel without MRET \$7.71/t. Thus the effective subsidy value of MRET \$33.33/t

- 79
7. One of the claimed benefits of the project is *"the generation of electricity from renewable biomass material in contrast to current practice which under-utilises a valuable resource,"* Burning wood from native forest which has been industrially logged for woodchips is not a renewable technology. At least 180 years are needed for most of the forest to replace itself once it is logged intensively for woodchips.
 8. *"The supply of around 22 GWh of base load power annually to the electricity grid";* The Eden chipmill is an ideal site for alternative forms of renewable energy which could be generated more cheaply at this site using wind, solar or tidal technologies.

I unconditionally oppose this proposal and call on the Minister to reject it.

[Redacted signature block]
cm

Anna Timbrell
Environmental Planning Officer
Infrastructure Projects
Department of Planning
GPO Box 39, Sydney NSW 2001
Sydney NSW 2000



PCU004188

Dear Ms Timbrell

I would like to make my objection to the proposed wood fired power station burning native forest wood in the Eden area.

I disagree with the use of native forests for wood chipping purposes, and therefore must dismiss the idea of using 'wood chipping waste' for anything whatsoever.

It has been shown that there are plantation forests enough for our timber needs. Native forests now prove themselves too valuable as a resource of natural beauty, place of protection for a whole range of indigenous animals and plants, and an integral source of clean air, to be destroyed by uneconomic forestry activity.

The proposed power station has real problems of pollution inherent in its running, and while there are alternative sources of power, just as accessible but without polluting factors, why not use them.

Please consider consequences carefully

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Julie Roberts'.

Julie Roberts
"Gentle Valley"
Cobargo
NSW 2550

Department of Planning Received 08 APR 2010 Scanning Room
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5th April 2010

12/Apr/2010
Haruka Takahara
24 Terry Street
Tempe, NSW
2044

Anna Timbrell
Environmental Planning Officer
Infrastructure Projects
Department of Planning
GPO Box 39, Sydney NSW 2001
Sydney NSW 2000

Stop the Eden woodchip forest furnace

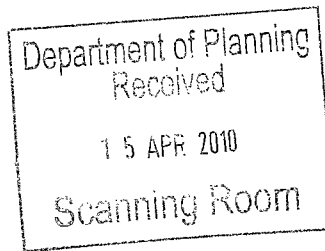
Dear Anna Timbrell,

I am asking to you not to approve the proposed biomass power station as Eden. The fuel to be used is not “waste” and would not exist if one million tonnes of trees (almost 19,000 hectares of forest) were not logged each year to supply the chipmill. The existing use of the proposed fuel generates substantially less greenhouse gas than the proposed power station because, as mulch, it decomposes slowly and transfers significant carbon to the soil. In regard to the impact on humans, while acknowledging that deadly dioxins, furans and HAPs will be emitted, the EA does not examine the human health implications of the emissions at all.

Still worse, very hot water will be discharged into Twofold Bay. The temperature of cooling water discharged into Twofold Bay will be more than 21 degrees above the ambient water temperature in the winter. The Weedy Sea Dragon, a threatened species, can only survive in temperatures less than 22 degrees. The EA says that the sea dragons will go somewhere else. In addition, Green Sea Turtles, the presence of these creatures is noted but the report fails to mention that in other power stations in NSW, turtles are regularly trapped in cooling water pipes because they are attracted by the warmer temperature.

Please just reconsider this project. Your decision will mean life or death for our wildlife and endangered species.

Sincerely,
Haruka Takahara



Mr Chris Jackson
44 Londonderry Drive,
Killarney Heights
NSW 2087
12/04/2010

Dear Anna,

OBJECTION TO PROPOSED EDEN WOOD FIRED POWER STATION

I am writing to you in regards to the proposed wood fired power station at Eden, the future of which will be decided later this month.

I am very strongly opposed to this project for a number of reasons which include;

The use of a native forest for woodchips in the first instance is poor environmental practice and is regarded by many Australians as just being the wrong thing to do with our natural resources.

Electricity generated from native forest just does not make sense in regards to reducing greenhouse gas emissions. The so called waste by-product of woodchipping that will be used to power the plant will in effect be more greenhouse gas polluting than that of a coal fired plant. As a follow on from this surely any future investments in power generation in this state and Australia in general should be of a truly renewable non-polluting nature.

In general terms this whole proposal seems to be at odds with the generally accepted view that it is imperative from an environmental viewpoint to both preserve native forests and reduce our reliance on polluting forms of electricity production.

NSW and Australia as a whole appears to be stuck in a time warp by denying that projects such as the Eden wood fired power station are environmentally inept. We as a nation very much risk looking like climate change deniers in the Western World whilst trying to preach to others what needs to be done. I'm sorry but this country has to be seen to be promoting progressive change and NSW is walking away from informed voters if it goes ahead with this project in Eden.

Regards, Chris Jackson

12/4/2010

Anna Timbrell

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

Robyn Martin

PO Box 4039
Candelo 2550

Dear Anna,

I am writing to express my deep concern regarding the proposed wood fired power station that South East Fibre Exports, the owners of the Eden chip mill, want to build.

I am a school teacher at Eden High School and a member of the local community. I moved to the south coast 4 years ago attracted to the natural beauty in the area.

My first issue with the proposal is that it states that the power station will be fuelled with 'waste wood' from logged trees in our native forests. This wood is not waste. It is home to our native animals and stores carbon to help keep our air clean. It is also what keeps our local area beautiful and attractive to tourists and local community.

I know that the wood chip industry is in a down turn because foreign markets are resisting buying wood from our native forests. So, now rather than looking at cleaner power alternatives, the owner of the chip mill is eyeing another destructive avenue for making money. It is an absurdity that a plan to burn and destroy one million tonnes of our native forests per year for the profit of a few is even being considered. This is a short-sighted option that doesn't plan for the future. We should be serious about pursuing renewable energy that can be generated more economically at this site e.g. wind, solar or tidal technologies. Tree regrowth takes decades and a great deal of water. However, the sun, the wind and the tides do not need to regenerate. They are readily accessible. Investing in infrastructure and job opportunities in renewable energy is much wiser short and long term planning for our local community, nation and planet.

Another concern is the marine life in Twofold Bay. The temperature of the water to be used in the cooling process at the furnace will be at least 21 degrees hotter than the ocean temperature in the winter. This will have a dire effect on the marine life in the bay. The threatened Weedy Sea Dragon cannot survive in temperatures higher than 22 degrees. The poor Green sea turtles will be attracted to the warmer temperatures only to be sucked in and trapped in the cooling pipes.

I also have fears regarding algae bloom resulting from these higher temperatures. The toxic treatment of the heated water will add to this bloom and make the water

unsafe for sea animals and people. This will have a catastrophic effect on the tourist trade in the area.

The real economic future of this area is its natural beauty and wild life. Whale watching tours are big business here. However, the noise from the furnace could scare the whales away from Twofold Bay.

The owners and real financial benefactors of this project live in Japan. They will not personally have to live with the havoc caused by this proposal.

For the sake of the future of our children, we must go with cleaner and more easily renewable energy. At first it may seem more expensive, but over the long run: the sun, the wind and the tides are the most economical way to go. The proposed furnace is not efficient. There will be 75% heat loss. If this reckless projects goes ahead, our carbon storing, water storing, native animal housing, rain making, tourist attracting, beautiful native forests will be burnt and turned into ash polluting sediment.

Please do not approve this outrageous proposal.

Regards,

A handwritten signature in black ink, appearing to read 'Robyn Martin', with a long horizontal stroke extending to the right.

Robyn Martin

12/4/2010

Anna Timbrell

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

Sam Martin

PO Box 4039
Candelo 2550
Ph (02) 64932956

Dear Anna,

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My first issue with the proposal is that it states that the power station will be fuelled with 'waste wood' from logged trees in our native forests. This wood is not waste. It is home to our native animals and stores carbon to help keep our air clean. It is also what keeps our local area beautiful and attractive to tourists and local community.

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Sam Martin