



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

22 April 2010

Re: MP09_0034 SEFE Biomass-fired Power Station EIS

The Conservation Council ACT Region Inc. wishes to strongly object to the abovementioned proposal on two grounds: (a) inadequacy of the Assessment, and (b) unacceptable levels of environmental impact.

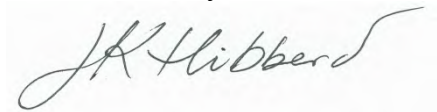
The Council represents 33 environmental, conservation and community organisations across the ACT and south-eastern New South Wales. It works to achieve biodiversity conservation and ecological sustainability. We believe that this proposal will seriously impact upon both of those objectives, which we understand are core objectives of the NSW State Plan.

Our key concerns can be summarized as follows:

1. The fuel to be used is not “waste”, and would not even exist if one million tonnes of native forest pulpwood (equal to nearly 19,000 hectares of forest) were not logged each year.
2. The proposal depends upon, and will in fact support, the continuation of the native forest woodchipping industry – an unsustainable industry totally opposed by this Council. The Council has researched forest growth data and has incontrovertible evidence that the current logging intensity is not sustainable, and thus the proposal itself is unsustainable.
3. The proposed power station will generate substantially more greenhouse gas emissions than alternative sources of fuel, and even more emissions than a coal-fired power station. The emissions from native forest logging must be counted in assessing the emission implications of burning native forest wood for electricity: the whole life cycle of the fuel must be taken into account. 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 power.
4. The proposed power station will forgo opportunities to return and store carbon in the local environment.
5. The project is highly wasteful of a valuable resource as <75% of the heat generated is not captured.
6. The EIS totally ignores the enormous ecological implications of intensive industrial-scale logging which will be required to supply the fuel.
7. The assessment does not examine the human health implications of the emissions.
8. There are potentially severe environmental implications (especially upon Weeds Sea-Dragons, Turtles and Whales) of discharging high-temperature waters into Twofold Bay, which have been poorly examined in the Assessment.
9. The proposal will compete with and potentially displace genuine renewables permitted under the Mandatory Renewable Energy Target MRET scheme.
10. There are a suite of alternative technologies (wind, solar and tidal) which could generate electricity more cheaply and more appropriately at this site

In summary, the generation of electricity from renewable biomass material “in contrast to current practice which under-utilises a valuable resource” is not a renewable technology. Up to 200 years are needed for the forest to regain its previous structure, composition and carbon-storage capacity.

Yours sincerely,

A handwritten signature in black ink, reading "John Hibberd". The signature is written in a cursive style with a large, stylized 'J' and 'H'.

John Hibberd
Executive Director

April 17, 2010

Anna Timbrell

Environmental Planning Officer

Infrastructure Projects

Department of Planning

GPO Box 39, Sydney NSW 2001

Sydney NSW 2000

Dear Anna Timbrell

Re: wood power station at Eden

How can you even consider such a preposterous plan?

I am sick of seeing our native forests logged, I am sick of seeing our native forests woodchipped, and now you want to burn them as well. I would have thought there was enough science out there to show that this is not the way to generate power. With Climate Change such a big issue at present, how can you even consider adding to the problem with this backward idea.

And what about the safety of the wildlife in the area. Koalas and other native animals in our native forests have a right to live, and to live peacefully. And then there is the impact on the ocean wildlife with who knows what chemicals being discharged into the ocean.

We have more passive options of generating power available to us, so why not pursue these. It is time the government stopped pandering to the Forestry Industry and realise that our native forests are not there for their taking.

It is time to put an end to woodchipping our native forests, and burning our forests should not see the light of day. Move away from these archaic practices and start implementing modern methods of producing power i.e. solar and wind power.

Hoping for sane outcome

Yours truly



Janice Sagar

PO Box 1000

Moruya NSW 2537



Eurobodalla Greens
 PO Box 295
 Moruya 2537
eurobodallagreens@yahoo.com.au

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

Submission to Department of Planning re proposed wood fired power station (at the South East Fibre Exports chip mill site, Edrom Road Eden NSW).

Submission from Anne Marett, Secretary, on behalf of the Eurobodalla Greens Group, 14 April 2010.

Introduction

The proposal to establish a wood fired power station burning native forest wood raises many concerns which deserve serious consideration and would lead to the conclusion that this project must be rejected by the current government or any future government.

This proposal is designed to continue a highly destructive industrial logging activity that is costing the environment and taxpayer dearly. The fuel to be used is not "waste", but this project would create an alternative use for the one million tonnes of native forest trees currently logged each year to supply a rapidly declining woodchip market for paper production.

Comment on the Environmental Assessment

The scope of the final Environmental Assessment for this project is so narrowly defined as to be verging on meaningless:

- it ignores the ecological implications of intensive, industrial logging required to supply the fuel for such a power station
- it fails to consider the on-going disruption to local stream systems, and hence local water supplies, generated by intensive industrial logging in the SE of NSW and East Gippsland
- it fails to take into account the carbon emissions of the full life cycle of the fuel, ignoring the greenhouse impacts of native forest logging
- it trivializes the potential ecological impact of heated waste water to be discharged into Twofold Bay
- it fails to examine the human health implications of the emissions of the furnace
- it overlooks the impact of salt contamination on the stockpile of fuel, stored just a few metres from the ocean, which will increase dioxin levels

- it trivializes the impact of the sulphur dioxide odour, generated by the process, on the local community
- it completely overlooks the consequences of acid rain which will result from the sulphur dioxide emissions

Other General Concerns

- Not a "green energy" solution - this project is dishonestly justified on the basis of it contributing green energy for the chip mill activity and the region.
In fact when the full life cycle of industrial logging is taken into account it will far exceed the greenhouse gas emissions of even a coal fired power station (up to 6.4 times more greenhouse intensive). However it will not be competing with coal fired power production. If it is permitted under the Mandatory Renewable Energy Target MRET Scheme, it will be displacing genuine clean energy sources including solar, wind, geothermal etc.
- Cost to taxpayers - the current native forest chip milling industry is costing the Australian taxpayer dearly. To prolong this industry in the guise of green power would be to continue this cost, at the very time when the Australian taxpayer is sending aid to SE Asian nations to cease logging of their forests.
- Lost carbon sink - the native forests of SE Australia, if rehabilitated and protected, have the potential to store very significant amounts of carbon (refer to Mackey et al "Green Carbon" 2008). At the same time they would protect local fresh water supplies and assist in producing rainfall across the increasingly drought prone SE, while protecting the ecological diversity of these ecosystems.
- Not an efficient or economic solution – this power plant will be extremely inefficient (75% heat will be lost) and expensive. The site happens to be one of the best locations in Australia for wind power which could produce the same amount of power for less.

Conclusion

This is a [REDACTED]. The international demand for native forest woodchips is in decline and Japanese paper manufacturers are increasingly reluctant to accept the Australian Forestry Standard (AFS) certification currently attached to native forest wood products. It is not considered a guarantee of sustainability.

To prolong the life of native forest industrial logging in SE NSW and East Gippsland by creating a high greenhouse gas emitting power generation industry, at this time when we understand how critical it is to massively reduce our greenhouse gas emissions, would be insane and immoral.

30 Bowthorn St. Downer ACT 2602
62577093

14th April 2010

Dear Ms. Timbrell,

Please consider this a submission, in regards to the proposal to make the Eden woodchipping mill a biomass electricity provider. I have been informed that this would not be viable or wise for a number of reasons, including the enormous amount of water required; its return to the sea at 2-3 degrees warmer than previously; the toxins the water would then contain; the emissions elsewhere also polluted (ie: atmospheric); and as well, the continued million tonnes a year of so-called 'Waste' wood, that would continue to devastate the South East Region's Native Forests and the Animal Habitat they provide - for instance, Mumbulla State Forest, currently slated for logging and home to the region's last known Koala population - tragic.

Yours Sincerely, 

Keri James

70 DORTON RD
Tullera NSW 2480
13/4/10 0110

Anna Timbrell
Environment Planning Officer
Infrastructure Projects
Department of Planning
GPO Box 39, Sydney, 2001

Dear Ms Timbrell,

There is a plan to set up a power station at Eden burning woodships from native timber. Burning wood to produce electricity is less efficient than burning coal to produce electricity. Burning wood produces more greenhouse gases than burning coal. It is suggested that only 'so called' waste will be burnt but in fact other timber may be burnt also.

Large scale burning is not good for the environment. Renewable energy such as solar & wind is cleaner. It is better to support & develop this now.

It is not a good idea to take all the substance of a felled tree out of the forest unless it is of use other than burning. Organic matter is needed to protect the soil from erosion and to renew the soil as it decays. Wood waste even if it is removed makes

good mulch or compost.

All timber is precious as it takes many years for another tree to grow to replace a tree cut. Why start up this use of felled trees.

Yours sincerely

Angela George

A W George

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

Colin Sagar
 45 Beauty Point Rd
 Beauty Point NSW 2546
 Ph 0264935073

Eden woodchip forest furnace:

Please accept this as my public submission re South East Fibre Exports (SEFE), owners of the Eden chipmill proposal for a wood fired power station burning native forest wood.

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. dioxins, furans and HAPs will be emitted, the EA does not examine the human health implications of the emissions at all.

1. Climate Change Implications

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. 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." However, 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.
6. 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.

7. 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 cycle of the fuel is assessed, wood fired power is as much as 6.4 times more greenhouse intensive than coal fired power.

2. Natural Environment Implications

Any consideration of the proposed wood fired power plant must be accompanied by a full environmental assessment of ongoing native forest woodchipping in South East Australia.

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. 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>

3. Woodchipping Disgrace

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. 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.

4. Eden Area Implications

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.

1. 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.
2. It will not "improve the reliability of the local electricity supply." 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.
3. 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.
4. 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. The EA fails to provide any detail of the nature, volume and consequences of those emissions.
5. Bega Valley Shire Council Zoning. The chipmill site is currently zoned 1(A) agricultural, arguably not appropriate for this type of development.
6. Anti-fouling treatments (8-17). Toxic treatments may threaten marine life and mussel culture.

5. Renewable Energy

Electricity generated from native forest wood fired power is even more GHG intensive than coal.

1. 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.
2. 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..
3. Renewable resource?... At least 180 years are needed for most of the forest to replace itself once it is logged intensively for woodchips.
4. 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.
5. 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?
6. The project is wasteful. 75% of the heat is "lost."

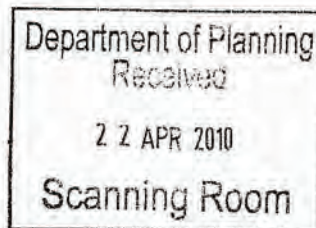
Alvin Sagar
14 / April / 2010

Submission opposing the South East Fibre Exports

5 MW Biomass-Fired Power Station – Eden

Submission prepared by Nick Summers

19/4/2010



Introduction

In this submission, I shall refer to the above project as the Eden 'woodchip-fired' power station. This is a more accurate description of the project, the term 'biomass' is deceptive, as it implies that actual waste fibre will be used to fuel the station.

Our forests are not 'waste' to be plundered for the quick buck but fragile eco-systems deserving of the utmost protection. The truth is that the majority of the fuel (71%) will be whole native forest trees. Trees, owned by the public, have immense value for storing carbon, providing water, shade, habitat and recreation. Trees are considered as freely available 'waste' in this proposal and are given no intrinsic value.

The environmental analysis of the proposal is weak and patchy. Impacts are downplayed or ignored. The proposal fails to include proper analysis of the industrial scale logging needed to supply the majority of the fuel. By not including the massive carbon emissions caused by industrial logging, the minimal analysis of localised carbon outputs is misleading.

Serious potential impacts on carbon and water storage are not quantified. Impacts of large scale logging on our native flora and fauna are ignored. There needs to be real and independent investigation of this proposal and the claims of the proponents.

I contend that any fair and complete analysis of the risks of extensive environmental damage due to the proposed woodchip-fired power station is reason enough to reject the proposal outright.

With the slump in world woodchip prices it is easy to suggest that this is a cynical attempt to prop up failed and archaic industry practices that promote the destruction of living trees as 'waste'. It doesn't exactly inspire confidence in the forward thinking of the proponents of this proposal.

Here are some more reasons why I oppose the woodchip-fired power station:-

The high risks to the many rare and endangered animals in south-east NSW

The last small population of koalas in this area is particularly vulnerable and deserving of real protection. There are many other plant and animal species that need support and protection, such as the tiger quoll, gliders, superb and swift parrots, owls, potoroos and glossy cockatoos.

These few examples of our native wildlife, speak for the many species in sad and rapid decline in this area, daily diminishing with the massive habitat devastation due to continuing industrial scale logging and burning operations.

The NSW Government should be rapidly scaling down native forest logging for woodchips and transitioning the industry to the plantation estate. To support the Eden power plant proposal would go counter to progressive forest practices and alienate the nature loving community here even further.

'Keneally Kills Koalas', is not a good look especially in an election year!

Woodchip-fired power is polluting

Even conservative estimates rate the proposed power station at least as polluting and toxic as coal. Other estimates suggest a power station many times more polluting and poisonous.

The station risks damaging air and water quality in the immediate vicinity of the proposed plant through particulate emissions, very hot liquid waste discharges, noise emissions, contaminated fuels and accidental toxic discharges.

The proposed station will damage the general air and water quality of the entire region and beyond, through the sustained logging and burning of thousands of living native trees each and every day, our natural heritage deemed as 'waste' by an irresponsible and antiquated industry.

Woodchip-fired power is bad for the climate

The way forward is wind, solar and other cleaner and more efficient technologies. To give any such station a preferred 'clean, green' taxation status or MRET type subsidies would be a travesty and bordering on wilful deception. It may, as well, impact negatively on the viability of genuine renewable energy technologies which really do need additional support.

If the NSW Government is serious about carbon reduction then there can be no justification for the approval of this proposed dirty, polluting, inefficient industrial monstrosity. The carbon emissions due to logging for the fuel for the proposed station must be included in assessing the carbon output of the proposed power station.

Other similarly absurd industry schemes, such as the infamous Mogo charcoal plant proposal, have been wisely rejected outright by the community.

Woodchip-fired power is bad for business

It is worth noting that current management of industrial logging in native forests, which involves many of the same industry proponents, has resulted in huge financial losses year after year, (\$16,000,000 last year). Current native forest logging operations run at a net loss to the people of NSW and should be stopped immediately.

By far, the biggest employer in the region is the tourism industry. An ugly, polluting woodchip-fired power station responsible for vast swathes of forest degradation is not what I would call eco-friendly!

The current view across Twofold Bay of mountains of woodchips is already an ugly eyesore. To add to this environmental and visual blight, an industrial power station complete with smoke stacks and a rapacious appetite for our, publicly owned, native forests would be foolish in the extreme.

Tourists come to this region to see majestic, undamaged forests and clean, unpolluted waterways and beaches. They also come to experience the healthy lifestyle that we lucky residents value so highly. The proposed woodchip-fired power station is in conflict with these healthy values and is a direct threat to the tourist based economy of the south-east region.

Conclusion

I ask you to reject this ludicrous proposal to build a woodchip-fired power station at Eden, NSW. The proposal is a recipe for environmental, economic and aesthetic disaster in the south-east.

South-east native forests are already threatened by irresponsible industrial logging practices and need to be protected. The proposal, if approved, will further encourage poor management practices, require large government subsidies and entrench disastrous industrial logging practices.

The proposal is not carbon neutral, will threaten vulnerable native flora and fauna species, will pollute air and water and will operate to the general detriment to the people of NSW.

I appeal to you to reject this ill-considered and destructive proposal.

Thank you,

Nick Summers
PO Box 3084
Tuross Head
NSW 2537

20th April 2010

0113

P.O. Box 123
Broadway NSW
Australia 2007

U.T.S.



Tel + 61 2 9514 1155
Fax + 61 2 9514 1157
www.sa.uts.edu.au

113 To Anna Timbrell,

I am writing to you on behalf of a student group at the University of Technology, Sydney, called the UTS Environment Collective. We are writing a submission to oppose the planned wood fired power station near Eden. We are aware that this project is brought by South East Fibre Exports, the owners of the Eden chipmill.

We are strongly opposed to the proposed biomass plant for a number of reasons, including the following:

- Electricity generated from native forest wood is more greenhouse intensive than coal-fired power
- The plant will possibly displace genuine renewable energies permitted under the Mandatory Renewable Energy Target (MRET) Scheme.
- When calculating the emissions per unit of output, the emissions created in the logging and transporting process are not included
- Burning wood to make electricity is extremely wasteful, about 75% of the heat is lost.
- We are concerned that woodchips that aren't able to be sold will go to the power plant, meaning valuable native forest instead of waste-wood will be used to make electricity.

Whatever the problems are in the local area, we are sure this is not the best nor only solution. We would be very happy to discuss this further,

Sincerely, on behalf of UTS Environment Collective

Gemma Romuld (0421 955 066)
utsenviro@gmail.com *Gromuld*

20th April 2010

Student Environment Activist Network

19 Eve St

Erskineville

NSW 2043

0113, 0114, 0115, 0116, 0117, 0118

Dear Anna Timbrell,

we are writing to make a submission opposing the proposed wood fired power station at the Eder woodchip mill. We are of the Student Environment Activist Network, which currently represents 200 students in universities across NSW.

We are opposed to the project for many reasons, including the following:

- The Environmental Assessment does not examine the human health impacts of the emissions
- electricity generated from native forests is more greenhouse intensive than coal-fired power
- the plant will displace genuine renewable energies permitted under the Mandatory Renewable Energy Target (MRET) scheme
- we are concerned that woodchips that aren't able to be sold well end up going to the power plant, meaning valuable native forest instead of waste-wood will be used to make electricity
- we are also concerned generally about the future of woodchipping on the south-east NSW forests and its long-term implications for biodiversity and koala populations

Wood-fired power is not a responsible or real solution to climate change and neither is it a solution to the economic difficulties facing logging communities. We urge you to consider alternatives.

Sincerely,

Ann-Marie Rohlf

Holly Greenaume

Ryan Castle

James Curtin James Curtin

Gemma Ramulal / Ramulal

Cecilia Vagg

Anna Trimbell
Infrastructure Projects
Department of Planning
GPO Box 39
Sydney NSW 2001

Australian Student Environment Network
19 Eve St
Erskineville
NSW 2043

20th April 2010

RE: Proposed wood fired power station at Eden woodchip mill

To whom it may concern,

This letter is a submission opposing the Eden wood fired power station. It is sent on behalf of the Australian Student Environment Network (ASEN), representing hundreds of students and student groups across Australia.

Members of ASEN do not support the proposed power station for a number of reasons, but particularly regarding the environmental impacts of wood-fired power generation.

Wood-fired biomass power is not carbon neutral and in the medium-term emits far greater carbon per megawatt than even coal. Our climate cannot afford to wait hundreds of years for carbon emitted by these power stations to be re-sequestered. Recent research also suggests that native forests are far more carbon dense than regrowth forest. Even assuming the longest harvesting cycle imaginable, much of the carbon released will never be re-sequestered.

Native forest is more valuable to our country in its current form than as an inefficient and polluting source of power. The industry claims that only waste will be used in the generation of power. However, with native forest woodchip prices steadily declining and power prices increasing it is hard to believe that once a power station is constructed there won't be pressures to burn whatever is available. Additionally, international carbon accounting methodologies for biomass are still very much under negotiation. Construction of wood-fired power stations in Australia locks our country into a form of energy generation that is dependent on a scientifically inconsistent and probably short-term arrangement under the Mandatory Renewable Energy Target scheme (MRET).

We are concerned that forestry workers in the region are being offered yet another short-sighted and unsustainable livelihood. This power station is not a real solution to the economic difficulties facing the region or the forestry industry. We feel these communities would be better served by an industry that has a stable future, providing real value to country. The NSW Department of Planning surely has a role in facilitating this process and in planning a more sustainable future for logging communities and our state's forests.

Sincerely,

Ryan Castle
Australian Student Environment Network

Chris & Tony Sweeting
 Miltana
 1726 Big Jack Mountain Road
ROCKY HALL NSW 2550

19 April 2010

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

Dear Ms Timbrell

Proposal for a Wood Chip Forest Furnace for Electricity Generation by South East Fibre Exports

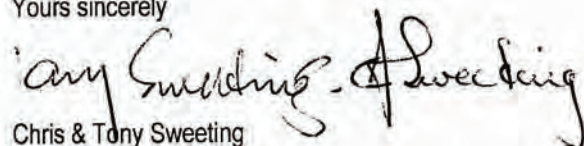
As background, living at Rocky Hall we are nearby residents to the proposed wood chip forest furnace generating idea, having relocated to the area eight years ago. We believe our environment has been changed by logging in the upper areas of our catchment. This is especially evident in observation of the southern tributaries of the Towamba River where logging, planting of poor value pine wood plantations (I have been in the building industry) and high water usage of these plantations has resulted in no water coming from the southern tributaries to the Towamba River. This is of great concern and we would not like to see any expansion of logging in the area.

Regarding the Eden Chipmill proposal for power generation using waste materials we have a few comments we would like you to consider please:

1. We understand that chipped materials become waste once chipped. It would seem to us that many logs we have seen going to the mill deserve a better and more carbon productive end, to be sawn into useable timber rather than being chipped. To us there is a danger that good usable timber could be chipped to support this scheme.
2. We understand that for environmental sustainability a forest needs 180 years to regenerate. It would seem that solar, wind, tidal, geothermal power generation would be much more sustainable and preferable. To cite loss of jobs as a reason for going ahead with the project is a nonsense as generation of power by more sustainable means would create jobs.
3. The possible consequences of this proposal, ie sulphur smell, air and ocean pollution, impacts on human health could severely impact on the tourist industry of the Eden area and this needs to be properly assessed.
4. It is alleged that compared with coal fired generation wood fired power is possibly 6.4 times more greenhouse intensive. This should be investigated and proved either way before commencement of any woodchip energy generation project.
5. It seems that no real consideration has been given to the impacts on human and environmental health, rather it is a desperate attempt to keep an unviable industry going. We are aware that the woodchip stockpiles are growing and cannot be profitably sold at this time.

In general we consider that insufficient consideration has been given to this proposal and we would like to see a comprehensive industry-independent assessment of the proposal and its impacts on the environment and community.

Yours sincerely


 Chris & Tony Sweeting