

PCU004292

PART 5: 19 SUBMISSIONS

8 April, 2010

Anna Timbrell
Environmental Planning Officer
Infrastructure Projects
Department of Planning

Dear Ms Timbrell,

Below is my submission opposing the proposed Eden Woodchip Forest Furnace.

Yours truly,

A handwritten signature in black ink, appearing to read "Mary L. Katz".

Mary Lois Katz
16 Edna Drive
Tathra, 2550
NSW

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.

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. The wood left over after logging is there due to sloppy logging methods and sawing procedures at the mills. It is ironic the 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. Whale watching tours are big business there. However, the

noise from the furnace could scare the whales away from Twofold Bay.

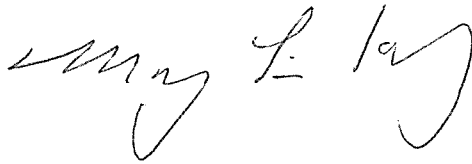
I think that we have to call a spade a spade. The developers of this project can gloss over the results of their financial activities but they won't have to personally live with the mess. The owners live in Japan.

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 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.

copy
✓

Lois Katz
16 Edna Drive
Tathra, 2550
NSW



02-6494-5887



Coastwatchers

Eurobodalla's environment group

20 April 2010

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

SOUTH EAST FIBRE EXPORT 5.5 MW BIOMASS POWER PLANT – SUBMISSION ON ENVIRONMENTAL ASSESSMENT

The Coastwatchers Association believes that the scope of the South East Fibre Exports (SEFE) Environmental Assessment (EA) is too narrowly defined. Firstly, it totally ignores the immense ecological implications of the intensive, industrial scale logging required to supply the fuel for this power plant. Secondly, it ignores the large greenhouse gas impacts of native forest logging. Thirdly, whilst the EA acknowledges that the plant will emit dioxins, furans and other gases, it does not examine the human health implications of the emissions.

Comparisons of greenhouse gas implications of this power plant should be made with wind or solar or other MRET approved technologies with which it will be competing - and potentially displacing - in the market place, rather than coal fired power.

Coastwatchers does not support the proposal to include native forest biomass as an eligible renewable fuel in this scheme for the reasons set out below.

Fuel types and sources

- Energy production from biomass is only as sustainable as its feedstock. Without ongoing wood chipping of a million tonnes of native forest a year (almost 19 000 hectares of forest) there would be no "waste" available to fuel this power plant.
- The EA claims that the generation of electricity from renewable biomass 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 forests to replace themselves after being logged intensively for woodchips.
- There has been no serious attempt to assess the sustainability of the required native forest logging. The EA simply claims it is "sustainable" because most SEFE woodchips are certified under the highly controversial Australian Forestry

Standard certification (AFS). However, it should be noted that 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. The Europeans are also rejecting the AFS in relation to the Gunns operations in Tasmania. They are requiring the more stringent internationally accepted standard.

- The 2008 State of the Forests Report states that Australia has 10% less forest than previously thought for the past five years. This has raised concern that forest agreements and environmental policy may have been based on flawed figures.
- The major type of vegetation exploited by the forestry industry (tall open forest and open forest) covers only 4% of Australia today. There is mounting evidence that native forests are being depleted at a faster rate than they can replace themselves. This does not support the assertion in the Regional Forest Agreements that the native forest industry is sustainable.
- The fuel for the power station is **not** "waste." It is material that already has an economic value and is bought and sold in the market place. Only a tiny amount of "waste" is currently incinerated. Burning it as electricity under the MRET scheme gives it a higher value because of implicit subsidies.¹
- Eligibility of the plant for the Abatement Certificate Provider scheme (EA 3-6) is unclear, especially with uncertainty surrounding the future of the Carbon Pollution Reduction Scheme. This should be clarified.

Greenhouse gases (GHG)

- The greenhouse gas analysis in the EA is based on the arbitrary decision of the Australian Government to deem the burning of biomass to be carbon neutral.
- Wood fired electricity production from native forest biomass is **NOT** carbon neutral if the whole life cycle of the fuel is taken into account. When regrowth native forests are logged the carbon they have stored for decades in their wood and in the soil is released.
- All emissions from logging should be counted in the assessment of burning native forest wood for electricity. It is simply not valid to start counting at the furnace door.
- 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."
- Logging of native forests to supply the Eden chipmill has been conservatively estimated at over 18 million tonnes CO₂-e per year². This figure does not include the emissions from running the mill, and transport associated with logging contractors or deliveries to the mill.
- When power generated from native forest is compared with coal fired power and the full life cycle of the fuel is assessed, wood fired power produces as much as six times the amount of carbon dioxide released from burning coal to produce the same amount of energy³.

¹ 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).

² Data from : Mackey et al "Green Carbon" 2008 ; FOI from FNSW 2006-07 FNSW for the Eden, South Coast/Southern and Tumut areas.; and approx hectares logged in East Gippsland 2007.

³ Dr John Kaye MLC. Adjournment Speech 2 December 2008

<http://www.john.greens.org.au/media/adjournment-speech-eden-chipmill-and-green-power>

- Whilst forest regrowth would bio-sequester some of this carbon, it would be at a very slow rate. It would take about 80 years of regrowth to capture the five tonnes needed to bring greenhouse gas emissions down to the same level as that from coal. SE native forests are relogged in a much shorter cycle. After 20 years they would have captured only two tonnes of emissions, leaving more than four tonnes in the atmosphere.
- The existing use of the proposed fuel generates substantially less greenhouse gas than the power station because, as mulch, it decomposes slowly and transfers significant carbon to the soil. In contrast, burning the entire product instantly produces carbon dioxide. The greater emissions from the burning are **not** counted, while the smaller emissions from mulching **are** counted. This is not logical

Water Quality

- 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 (EA8-21), a threatened species, can only survive in temperatures **less than** 22 degrees. The EA says that the sea dragons “may avoid the area around the outlet” without providing any evidence that suitable habitat is available nearby.
 - b. The presence of Green Sea Turtles 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. Noise may interfere with whale migrations via Twofold Bay (EA8-10)
 - d. Toxic anti-fouling treatments (EA8-17) may threaten marine life and mussel culture.

Hazards and Risks

- Whilst the EA acknowledges that the plant will emit dioxins, furans and other chemicals it does not examine the human health implications of the emissions.
- The EA leaves open the possibility that some of the bigger particulates will be emitted, but fails to provide any detail of the nature, volume and consequences of those emissions. There is no justification for ignoring them.
- 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 yet the stockpile of fuel will be stored a few meters from the ocean where it will be contaminated by salt, increasing dioxin levels.
- While it is acknowledged that sulphur dioxide will be emitted, there is no consideration of possible acid rain consequences.
- Heavy metal content in ash will exceed allowable limits. Additional approval from DECC will be required to use it on the SEFE Rockton plantation.

Flora and Fauna

- Approval of the power plant will assure the regional extinction of koalas and other endangered forest species including owls, glider, possums, bats and Superb Parrots.

This woodchip fuelled power plant is not a genuine 'clean green energy source'. The site is ideal for alternative forms of renewable energy which could be generated more cheaply using wind, solar or tidal technologies. The proposal is **not** acceptable given the urgent need to stop logging, woodchipping and clearing of native forests around the world, including Australia, to reduce carbon dioxide emissions. Stopping the destruction of our native forests and woodlands would save up to 20% of Australia's carbon dioxide emissions.

On 22 March 2010 SEFE announced that the power plant project was "on hold". This statement reflects the state of the international woodchip market and demonstrates the dependency of the proposal on that market.

The Minister should reject the proposal. However, if approved, the Minister should impose the condition that approval will lapse if the project has not commenced within six months.

Sheila Monahan

Sheila Monahan
President

0142

Christopher Moore
10 Harrington St
Enmore NSW 2042

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

Dear Ms Timbrell,

I am writing to oppose the proposed wood-fired power station at the Eden chipmill. The NSW Minister for Planning should not approve the project, primarily for reasons concerning the unsustainability of native forest logging, and its contribution to climate change.

Logging

It is proposed that the power station will operate by burning waste. This is misleading; what it will actually burn is Australia's native forest. It is only "waste" because of the ridiculous practice of native forest logging.

The environmental assessment makes no consideration of the environmental impacts of logging. This is entirely inappropriate given that the power plant could not proceed without logging. The proposed power plant fundamentally alters the economics of logging, and therefore it warrants consideration of whether more logging is environmentally judicious.

Climate change

I am concerned that power generated from the proposed power station might be classed as renewable energy for the purposes of the Mandatory Renewable Energy Target (MRET). The proposed power station would most certainly not be renewable by any definition that is publicly acceptable (native forest logging is extremely emissions intensive, particularly due to loss of soil carbon, and the fact that the carbon stores take over a century to restore themselves).

The Australian Forestry Standard (AFS) is an inadequate benchmark – the application of a more widely accepted and more rigorous standard, such as Forestry Stewardship Certification (FSC), would undoubtedly lead to the conclusion that the native forest logging that will supply the power station is unsustainable.

If the power station is built, and classified as producing renewable energy for the purposes of the MRET, it would displace projects that are actually renewable (e.g. wind power).

Sincerely,

Christopher Moore

Submission opposing the Eden woodchip forest furnace

To: Department of Planning and NSW Minister for Planning Tony Kelly

Cc: John Kaye MLC

From: Catherine Moore, Greens candidate for Eden-Monaro

This proposal, to build a wood-fired power station burning native forest wood, would be in my opinion a disaster on many fronts, including biodiversity and ecological sustainability, climate change, human health, the further entrenching of the destructive practice of woodchipping and the wrong direction in regard to the generation of renewable energy.

It is very clear that the intent of this proposal is to ensure the continuation of the unsustainable woodchipping industry, so that there will be a market for the woodchips when the international price drops. It is not hard to see that the myth of woodchips being “waste” from sawlogs is just that – a myth – when you compare the tonnage of sawlogs produced to the tonnage of woodchips produced.

Given what we now know about the the importance of forests for carbon storage, for biodiversity and ensuring water quality, and the propensity for the proposed site to produce truly renewable energy through technologies such as wind, solar and tidal, setting an example for those who are also considering energy generated from forests, the proposal to generate power from our forests in this way makes no sense whatsoever and should not be approved if we are serious about addressing these issues.

Issues of concern

I understand that the chipmill announced on 22 March 2010 that this project is “on hold,” before it has even been approved. It is important that the Minister reject it or if he approves it, impose a condition that if no commencement has occurred within 6 months, the approval should lapse. Its “on hold” status reflects the state of the international woodchip market and demonstrates how dependent it is on that market.

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 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.

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.

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.” What 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.

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.

Health issues

The stockpile of fuel will be stored a few meters from the ocean where it will be contaminated by salt, increasing dioxin levels.

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>

A Canadian study commissioned by the government of British Columbia last year, "Emissions from Wood-Fired Combustion Equipment"

http://www.env.gov.bc.ca/epd/industrial/pulp_paper_lumber/pdf/emissions_report_08.pdf

f, 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

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

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.

The project depends for its fuel on the continued existence of the native forest woodchipping industry, one of Australia's biggest greenhouse polluters.

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.

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 year 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.

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.

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 power.

Woodchipping

Without ongoing woodchipping of a million tonnes of native forest a year, there would be no fuel available.

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.

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 per year (please refer to climate change section above).

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.

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. It would be better to leave them growing.

Additional health issues for the wider community

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.

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.

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.

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.

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.

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>

Other local issues/impacts

Bega Valley Shire Council Zoning - the chipmill site is currently zoned 1(A) agricultural, arguably not appropriate for this type of development.

Recreational divers will have reduced access to the chipmill jetty (8-23)

Anti-fouling treatments (8-17) - toxic treatments may threaten marine life and mussel culture.

Need for genuine renewable energy generated and used

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

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.

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.

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. There is no logic in this.

The project is wasteful. 75% of the heat is “lost.”

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.

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 renewable technology. At least 180 years are needed for most of the forest to replace itself once it is logged intensively for woodchips.

Furthermore, 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 is \$7.71/t. Thus the effective subsidy value of MRET \$33.33/t, so for economic reasons alone this proposal does not make sense.

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.

For the future of this country and all those who rely on its diverse ecological communities, please do not approve this proposal.

Yours faithfully
Catherine Moore
Charleys Forest
via Braidwood
NSW 2622
0411 288057



PCU004274

Jeff HSCHEMANN
1858 arakun Rd.
Moruya, 2537

DEPT. OF PLANNING
ATT. ANNA Timbrell
G.P.O. BOX 39
SYDNEY. 2001



N.S.W.
8/4/10

1 OF 2

RE: Biomass Burner / Eden NSW

I reject the proposal for
any biomass burner that uses
Native Forest / woodchips

Why

- Native Forest suck in CO₂ and give
off oxygen. Encouragement to cut
them at a faster rate will take
place.

- when taken into consideration
haulage costs and road wear etc. The
amount of megawatts will be
minimal.

- woodchipping forests (90% total
tonnage around Eden and 60%
around Batemans Bay Moruya) is
an unacceptable way to
utilize our native forest. A more
value added way would be better.

- Forest Areas used for the burner

Will be taken From N.S.W. Forest
~~dep~~ compartments that are located
in drinking water catchments. (ex
The Deua, Turrross & Buckenborra) Are example
of Eurobodalla shire catchments.

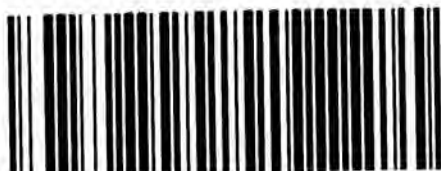
- Pressure will be put on
Private Forests to supply the
Burner.

- The burner will not be a
good tourist drawcard.

IN CONCLUSION, electricity
can be Found From a more
sustainable resource then
using our remaining Native
Forests.

Sincerely,

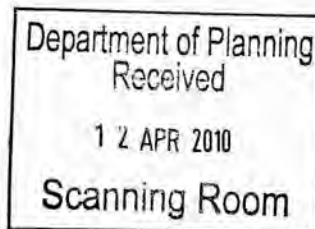




PCU004277

Kerstin Johansson
86/849 George St
Ultimo, NSW 2007
April 8, 2010

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



Dear Ms Timbrell,

I am writing to you in regards to the proposed South East Fibre Exports (SEFE) biomass burning power station in Eden. This power station will not only add to the destruction of ecologically important forests and water systems, but it will produce harmful toxins and increase greenhouse gas emissions. I urge you to reject the building of this wood fired power station.

This new power plant will destroy forests, including habitat of threatened koalas, and affect the aquatic life of Twofold Bay. Within 10 kilometers of the proposed station there are 22 threatened flora species and 39 threatened fauna species. These species could be considerably affected by the plant. The aquatic wildlife that would be harmed includes: the weedy sea dragon, a threatened species, green sea turtles, and whales.

Biomass may seem less polluting than coal, but in actuality burning native forests for fuel releases up to 6.4 times more greenhouse gases into the atmosphere. The project is wasteful; burning biomass is very inefficient allowing 75% of the heat generated to be lost as entropy. To reduce greenhouse gas emissions and reduce our carbon footprint we need to use renewable energy, not unsustainable and environmentally degrading native forest burning.

Finally, the health impacts to residents of the area could be significant. The Environmental Assessment of the SEFE plant ignored the human health implications of the emissions, but they did acknowledge that deadly toxins such as furans and HAPs will be emitted. Human health needs to be taken into account before this biomass burning station project gets passed.

I hope you take this letter into consideration and refuse to allow the proposed wood burning station. Please take the health of residents of Eden and the protection of the environment into consideration.

Sincerely,

Kerstin Johansson

The Hon Tony Kelly,
Minister for Planning,
Level 34 Governor Macquarie Tower
1 Farrer Place
Sydney NSW 2000

Dear Minister,

BIOMASS PLANT PROPOSAL, EDEN, NSW

The proposal by the owners of the Eden Chipmill to build a wood-fired power plant at Eden is being considered by your government, contrary to its promise never to use native wood for energy generation.

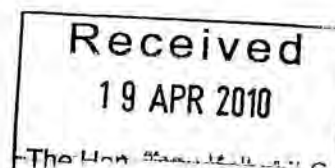
A wood-fired power station at Eden:

- Is not a genuine 'clean, green, energy source', and will undercut solar, tidal and wind power generators.
- Opens up a new market for native forest wood 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.
- Will add to the already burgeoning production of CO2 by NSW. Estimates show that wood fired power will produce at least four times more greenhouse gases than burning coal.
- Will produce particulates and heavy metals that are dangerous to health. This has not been sufficiently addressed in the proposal.
- Will discharge hot water and anti-fouling agents into Twofold Bay which are a threat to marine life, including Green sea turtles, the already threatened Weedy Sea dragon and mussel cultures.

This proposal should be rejected on all of these grounds, inter alia. Not only does biomass fuel make no environmental sense, but it allows the destruction of native forests to continue unabated through the continuation of woodchipping, with the inevitable effects of destroying biodiversity and condemning more native animals to extinction.

I call upon your government to reject this proposal and to commit to creating a genuinely sustainable logging industry based on plantations. Please pass on this letter to the Premier and count it as a submission opposing the Eden Wood-fired Power Plant.

Name, IAIN MCINTYRE Signature, [Signature]
Date, 14/4/2010
Address, 35 HARDING ST
COBURG PC 3058



The Hon Tony Kelly,
Minister for Planning,
Level 34 Governor Macquarie Tower
1 Farrer Place
Sydney NSW 2000

Dear Minister,

BIOMASS PLANT PROPOSAL, EDEN, NSW

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Name... NAOMI EVANS Signature... Naomi Evans

Date... 14-4-2010

Address... 35 Harding St.
Coburg VIC 3058

The Hon Kristina Keneally
 Minister for Planning and Infrastructure
 Level 35 Governor Macquarie Tower
 1 Farrer Place
 SYDNEY NSW 2000

E. WORTH
 379 Haslingden Rd
 Stony Creek NSW 2550

25th November 2009



Dear Minister

PLEASE REJECT THE EDEN CHIPMILL WOOD FIRED POWER STATION

My husband and I have a number of concerns we'd like to raise with you.

Firstly, we understand that the application to your department states that the distance from the town of Eden is 35 kms. We think that any emissions will be blown by the wind, not travel by road around the bay. This means that the station ^{will be} is a mere 3kms across the bay from Eden!

More importantly we are coming to an understanding of the importance of our forests to the wellbeing of our world. This power plant will just provide power to continue the destruction of our trees.

The Eden site is ideal for wind and wave power. Surely there must be a better way. Please help our community to find it.

Yours sincerely
 Elizabeth Worth.

South East Fibre Exports 5 MW Biomass-Fired Power Station – Eden

Application Number: MP09_0034

Submission to the NSW Department of Planning
from

John Kaye, Greens NSW MP

4 May 2010

I:\MLC Kaye\Portfolios and Issues\Energy\Wood-fired Power Stations\sub100426_SEFE chipmill.doc

South East Forest Export's (SEFE) Part 3A application for a 5 MW 'bio mass' power station at its chipmill near Eden should be rejected for the following reasons:

1. it would create an unacceptable air and water pollution risk within the local environment, with impacts on human health and plant and animal populations;
2. despite claims that the fuel source would be mill 'waste', a approval of the power station would inevitably result in the burning of woodchips which themselves are defined by SEFE as a waste product. The proposal is therefore highly likely to prolong the unsustainable logging of the forests of the South East with unacceptable consequences for the fauna and flora and the ecosystem that supports them;
3. the greenhouse gas emissions resulting from the forestry activities that supply fuel to the biomass power station would be greater per unit of energy generated than from a coal fired power station. SEFE's analysis of emissions ignores the greenhouse gases emitted from the forestry operations that supply the fuel. While the total quantum of greenhouse gases emitted would be relatively small compared to emissions from the state's coal-fired power stations, approval would create a dangerous precedent that would inevitably result in further native forestry-fuelled power stations;
4. approval would inevitably result in increased harvesting of the forests of the South East which would:
 - accelerate the ecological pressure on forests that are already logged unsustainably with unacceptable consequences for flora and fauna,
 - further damage to the tourism and other economic value of these forests, and
 - undermine the future of a genuinely low-carbon energy industry in the south east of NSW; and
5. the proposal would damage the capacity of the South East to develop its potential for eco-tourism and would consequently undermine employment growth.

The myth of waste materials

The proposal contends that the power station will only use fuel that is waste products of other forestry operations. It therefore rejects the need to account for any of the impacts of the native forestry logging operations that will provide the majority of the fuel.

This contention is entirely false on a number of grounds.

First this is an industry sector based on a [REDACTED] of waste. While SEFE's Eden mill exports almost 1 million tonnes of woodchip each year, the forests from which the raw materials are drawn produce only 100,000 tonnes of saw logs.

SEFE maintains the chipmill only uses waste products from native forestry.

This is an industry where the so-called waste stream is 10 times greater than the primary product stream.

For more information: John Kaye Parliament House Macquarie St Sydney 2 000; phone (02) 92 30 2668; email: john.kaye@parliament.nsw.gov.au

It would be exceptionally unwise to accept this industry's definitions of waste or any undertaking they might make to use only waste materials.

Secondly, the international price for woodchips is volatile. Many observers of the market are predicting oversupply in the next decade, resulting from over-production, particularly in the Pacific and Asia and from the threat of declining demand as consumers increasingly recycle and conserve by eliminating frivolous or unnecessary paper usage.

As falling prices eventuate, the owners of the chipmill will be faced with relatively high prices for electricity and low or more likely negative economic returns on their wood chip exports.

The inevitable and irresistible pressure will be to not only fuel the proposed 5 MW plant with woodchips which are already classed as a waste product, but to also build additional capacity to burn all of the 1 million tonnes of woodchips.

Applications for an additional 92 MW of capacity would be expected to follow declining international woodchip prices. The existing proposal, if approved, would have established a precedent for the additional capacity.

Thirdly, materials that are proposed to be used are no more validly termed 'waste' products of forestry and downstream operations than woodchips themselves. If the current proposal is approved, the case for consequently burning woodchips would be easy to make politically and in planning law.

Adding an additional economic stream by allowing the industry to enter into the electricity market will add value to the forestry operations that long ago should have been dramatically reformed to end the reliance on large scale industrial harvesting.

Greenhouse gas emissions

By excluding the greenhouse gas emissions from the forestry operations that will support this operation, the Environmental assessment Report is deeply misleading.

If the proposal is approved, the declaration of the materials that would be used as fuel for the power station as waste products of sawmills would be purely historical, particularly as woodchip prices fall and wholesale electricity prices continue to rise.

In effect, the power station is being given a free ride by hiding behind the lack of on-going greenhouse gas emissions from the forestry process.

Approximate analysis suggests that accounting for the substantial quantities of carbon that would be released into the atmosphere from the forestry activities to support the operation of this plant would cause the plant to be more than six times the greenhouse intensity of coal, at about 6.1 tonnes CO₂eq/MWh.

Even allowing for some re-sequestration of carbon from the growth of forests to replace those that have been harvested would reduce this to about 4 tonnes CO₂eq/MWh for twenty years of regrowth.

Only if the forests were harvested on an 80 year cycle would the proposal reach about 1 tonne/MWh and hence parity with coal.

Our analysis is based on published estimates of

- ♦ the number of tonnes of green wood "waste" per year to feed a 5 MW power station (NAFI 2005, p4)

- ♦ the number of tonnes of CO₂ per hectare in SE forests (Roxberg), and
- ♦ number of tonnes of green wood per hectare (the typical yield for the region).

In each case we have used conservative estimates that would tend to underestimate the emissions from the plant. The re-sequestration rates are also based on published estimates.

The significance of the greenhouse gas emissions reaches beyond the current application as it is likely to be used as a precedent for subsequent applications.

It is therefore important that an independent analysis of the life-cycle greenhouse gas emissions, including from the fuel cycle, be conducted before this application is assessed. Such an application should not use the manufactured definition of 'waste' that has allowed SEFE to bury its emissions into another process.

4 Ballima Court

BEGA N.S.W 2550



PCU004539

Departmental Head,

In regards to the proposed wood fired power plant at the Edrom woodchip mill at Eden, we wish to register our objections as follows -

1. This will generate more CO_2 gases than the current power supply.
2. There is a real possibility that valuable timber resources will be used when "waste materials" are in short supply.
3. Alternative energy sources, such as wind or the tide, would be better environmental alternatives, so creating no CO_2 emissions.

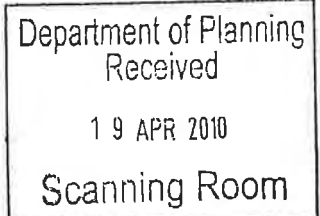
Yours for careful consideration

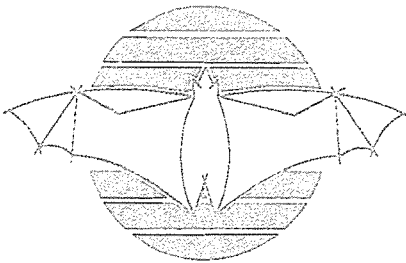
(Mrs.) Catherine Williamson

C. Williamson

(Mr.) Keith Williamson

K. Williamson





Ku-ring-gai Bat Conservation Society Inc.

Post Office Box 607, Gordon NSW 2072 Australia

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

21st April 2010

Re proposal for a wood fired power station at Eden

Ku-ring-gai Bat Conservation Society submits that this proposal should not be approved on the following grounds:

1. The burning of what is claimed to be forest 'waste' for energy production is not a sustainable means of generating electricity and should not be claimed to be so.
2. The remains of the vegetation following logging for the woodchip mill is part of the forests ecosystem and needs to be returned to the soil through decomposition in the forests.
3. The Environmental Assessment fails to consider the serious the long term ecological damage that logging of almost 19,000 hectares of forest (one million tonnes of trees) per year is doing to the native forests.
4. Instead of burning the wood waste it should be returned to the soil to increase its carbon content. Repeated removal over cutting cycles will prevent the recovery of the forest
5. The Environmental Assessment claims that lower greenhouse gas (ghg) emissions per unit of output would be generated from wood burning than from coal fired power stations. This assessment is inadequate because it fails to include the ghg emissions from the construction of the power station, roads and other infrastructure, and the logging of the forests to provide the fuel for the furnace. The whole life cycle of the fuel must be taken into account. If this more honest calculation is undertaken, wood fired power is as much as 6.4 times more ghg intensive than coal fired power.
6. Alternative energy generators which are far more sustainable in the long term such as wind, solar and wave action, should have been compared in the assessment.

Please accept this short submission on behalf of our members

Yours sincerely,

Ken Holland
Honorary Secretary

Anna Timbrell
 Environmental Planning Officer
 Infrastructure Projects
 Department of Planning
 GPO BOX 39
 SYDNEY NSW 2000

Deborah Yeo
 PO Box 325
 BEGA NSW 2550

April 15, 2010.

Dear Ms Timbrell,

Re: Proposed Wood Fired Power Station in Eden NSW

I am writing to express my concern regarding the approval and construction of the proposed wood fired power station at Eden.

South East Fibre Exports, owners of the Eden Chipmill state that the power station will be fuelled with 'waste wood' from logging of our native forests. I have lived in the area for 17 years and see on a daily basis truckloads of 'waste wood' on its way to the chipmill. This wood is not 'waste', it is habitat for plants and animals, storer of carbon and preserver of our delicate water supplies. The 'waste' from logging of native forest is left on the forest floor, bulldozed into piles and burnt green. That is a fact, what is on those trucks that goes to the chipmill as 'waste' are solid timber logs.


According to the International Union for the Conservation of Nature 2008 report, Australia has the worst record of mammal extinction or near extinctions of any developed nation in the world due to its deforestation practices. On a world wide stage for a supposedly educated society, that that is something to be proud of.

Another issue to consider is the health of the marine life in Twofold Bay. The temperature to be used in the cooling process of the furnace will be at least 21 degrees hotter than the ocean temperature in the winter, you don't need to be a scientist to know that this will have a dire effect on the marine life in the bay. Then there's the algae bloom that will result due to increased temperatures, in turn affecting tourism in the area. What will become of the whale watching businesses that operate in the bay when the whales no longer come into the bay because of the noise of the furnace.

It is a disgrace for a government to actively encourage the destruction of our native forests for the benefit of a few at the expensive of our natural biodiversity and future generations. The wood chip industry is in a down turn, this is a grab at an opportunity to use tax payer resources to provide yet another destructive avenue for making money. Lets look at cleaner power alternatives, listen to the science, take action to make the future better. We need to be serious about pursuing renewable energy.

Short term gain for a long term cost. Let us take an educated approach to the power needs of the future. Don't let the proposal go ahead.

Yours faithfully,


 Deborah Yeo

Anna Timbrell
Environmental Planning Officer
Infrastructure Projects
Department of Planning

Dear Ms Timbrell,

I am writing to you on behalf of my family and myself because of our deep concern regarding the proposed wood fired power station at Eden.

This project depends on the continued logging of our native forests. Logging is one of Australia's biggest greenhouse polluters. We know that native forests store carbon, research shows that forests store at least three times more carbon than previously thought. Along with the oceans plankton, native forests are the lungs of the earth.

Logging native forests destroys habitat and diminishes tourism. Who would enjoy spending their holiday looking onto a logging site or even in an area that allows such practices. I have spent much time in Mumbulla State Forest, which is currently being logged. This is a beautiful area that has a small koala population. It is shameful that logging is continued. This area must be protected. If the proposed wood fire furnace is agreed to we will loose more and more such forests. Can it honestly be said that that is the best for Australia?

Logging actually dries the ground and surrounding bush via canopy loss and soil disturbance. The tree canopy shades and protects the soil; logging however allows much more sunlight in. Disturbing the soil by removing the layer of natural mulch equals evaporation, thus logging creates a far more fire prone area.

Does Australia need to become any drier? Can we possibly believe that this is best for Australia's future? No one I know thinks so. Why choose to burn native forest wood, creating highly toxic emissions when wind or solar energy could be built for less. Wind turbines will be able to generate the same capacity (5MW) as the proposed chipmill power station. How about building something that we can be proud of and promote with honesty regarding the good that is being done.

Yours sincerely,

Rosemary Constable
118 Dr George Mountain Road
Tanja NSW 2550



Thankyou for your reply. As new user of broadband I cannot find the original message sent on'line through your DOP site on 20th april. I believe I would have completed all fields but may not have. NO other name would have been used.

However I re cut concerns from my draft and have copied it below.

I object to the intent and detail of this proposal on the following grounds.

"Chipping and burning native forest is not a sustainable energy source. Furthermore it's fuel source degrades emission management capacity of established forest. Subsidies would be better spent on renewable energy such as char and tidal projects on larger scales. This proposal denudes a locality and produces little return, only fuelling an anachronistic, heavily subsidised industry causing damage that will not recover long after the chip mill workers have passed on.

The region has just declared a marine park environment bordering the site and this proposal contradicts the principals and outcomes of marine conservation.

The air, water and land pollution and health consequences from the activity are inadequately disclosed and/or managed ."

I hope the issues can be addressed by the applicant.

yours sincerely,

Sally-Anne Brown

1051 Dr George Mountain road

Bega

NSW

BJS

#163
5 COBARGO STREET
QUAAMA NSW 2550

0163

22 April 2010

The Premier
Governor Macquarie Tower
Level 39,
1 Farrer Place, SYDNEY NSW 2000

premier@nsw.gov.au

Dear Premier,

RE: EDEN CHIP MILL – BIOMASS BURNING FOR ENERGY

To my knowledge there have been no studies on woodchip burning and its effect on Chronic Obstructive Pulmonary Disorder (COPD) in Australia.

Overseas studies prove that woodfire burning creates COPD. May I suggest that the health of the lungs of the people in Eden (6 k across the bay from the burner) be used as a test case? If the woodchip burner is approved, perhaps the health of the lungs of the children and adults in Eden should be tested now and at say, five, ten and twenty years.

This suggestion is of course why the biomass burner in Eden should not be approved.

Yours sincerely

Dr Bronte Somerset

164

premier

From: "mark.lems" [mark.lems@bigpond.com]
Sent: Thursday, 22 April 2010 8:46 AM
To: <premier@nsw.gov.au>
Subject: Woodchip Power

Dear Madam Premier

Please have it noted that I vehemently oppose woodchipping of our native forests to supply a woodchip fed electricity generation plant, currently being mooted for SE NSW.

As I have written a number of times to you/David Swain, the whole logging process in SE NSW is now a case of the tail wagging the dog. The woodchip industry (an extremely low margin commodity) will be even further devalued by burning.

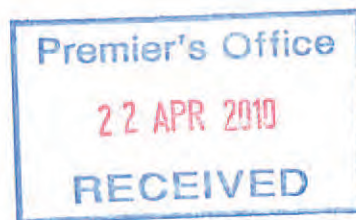
I believe that protecting native forests is one of the easiest and cheapest ways of minimising carbon emissions.

Coal seam gas is a far more efficient method from both an environmental and an economic point of view. NSW has massive resources in this field.

Mark Lems
Barrabooka Road
Tanja NSW 2550

192

PO BOX 7202
TATHRA NSW 2550



Kristina Keneally MP
Level 40
Governor McQuarie Tower
1 Farrer Place
SYDNEY NSW 2000

18 April 2010

RE: MUMBULLA STATE FOREST LOGGING

Dear Kristina

Please find enclosed copies of one letter to you signed by many concerned people.

These are local, some not so local and the indigenous Elders of the Mumbulla area represented. You will find that all are unanimous in their connection to the land, the preservation of the koala, the maintenance of the 'Wilderness Coast' and the old growth forest pockets.

You can use your intuition and expertise in ethical debate to see that this issue should be quashed immediately.

We depend on your leadership to use reasonable evidence when making environmental decisions.

Please help, Kristina.

Best regards,

A handwritten signature in blue ink, consisting of a stylized, overlapping loop and a horizontal stroke.

The Far South Coast NSW

Premier Kristina Keneally
Governor Macquarie Tower
1 Farrer Place,
Sydney NSW 2000

Dear Premier,

The Department of the Environment has confirmed a healthy, recovering population of 30-50 koalas on the NSW south coast, in the Mumbulla state forest. Forests NSW intends to log this forest, starting immediately. The Harvest Plans provide for over 92% of the timber in Mumbulla compartments to be logged, mainly for woodchips.

In addition, the compartments will be burnt after logging, which will further decimate the remaining koalas. Logging and burning is likely to result in the extinction of south coast koalas, by destroying habitat and expansionary corridors, and by directly killing koalas. Compartments in other as yet unsurveyed forests are also due to be logged in March, and this will also decimate small populations of recovering koalas that have not yet been identified.


Koalas have a range up to 50km, so logging around small 'cells' for koala habitat is not effective to safeguard populations. These koalas need space if their population is going to survive and grow to a viable size, capable of withstanding disease, drought and fire. Koalas must find trees with nutrient rich leaves for their highly specialised diet, and males need to find new territories.

These forests are also home to other endangered species, such as Long-Nosed Potoroos, Sooty Owls and Eastern Grey Headed Flying Foxes, as well as being critical habitat for the endangered Swift Parrot.

The NSW government appears to be placing very short sighted interests over the survival of this courageous animal, over our natural heritage and over the expansion of industries such as tourism on the south coast. The koala, one of our iconic native animals, could face extinction in these forests, for the sake of a very short term supply of woodchips and sawlogs, when there are now enough plantation resources on-line in Australia to ensure that no native forest needs to be logged.

The Environment Minister has stated he cannot alter supply contracts, but your Government *does* have the power to stop this logging. Or it can bear the public shame of being the Government that pushed Australia's iconic koala to regional extinction in the South East Forests of NSW.

We hope you will opt for saving these regional koalas and support a scientifically based recovery plan for them.

Name MAYA STATION Signed 
Date 20/4/10
Address 9 Prospect Ave
No-Make VIC 3070