

## Submission to the Victorian Renewable Energy Roadmap

Via email: [renewable.energy@ecodev.vic.gov.au](mailto:renewable.energy@ecodev.vic.gov.au).

30<sup>th</sup> September 2015

EEG congratulates the Victorian Andrews government on its progressive moves towards a genuine renewable energy industry in this state.

On page 8 of Victoria's Renewable Energy Roadmap August 2015:

*The Roadmap identifies the following four priority areas:*

- *Establishing a renewable energy target of at least 20 per cent by 2020*
- *Using the Government's electricity purchasing power to support the creation of hundreds of renewable energy jobs*
- *Ending unfair discrimination and improving access to the grid for solar customers*
- *Supporting clean energy jobs through the \$20 million New Energy Jobs Fund*

EEG would like to see Victoria aspire to higher targets such as the ACT has – a 90% renewables target by 2020. 20% is far too minimal and meek in this age of serious climate chaos. We agree with the other three points.

However on page 17:

*The Government is also participating in the Australian Biomass for Bioenergy Assessment project, funded by ARENA. The project aims to catalyse investment in the renewable energy sector by providing detailed information about biomass resources across Australia. This will assist in project development and decision making for new bioenergy projects.*

And

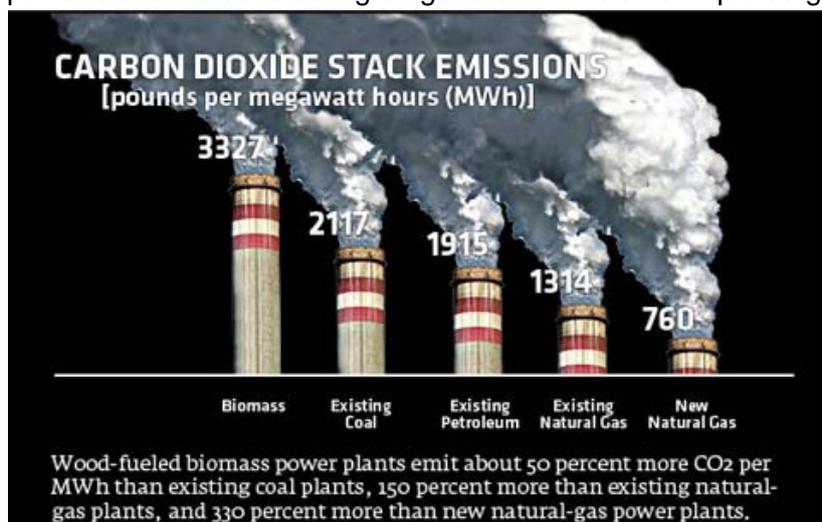
*Victoria has a comparative advantage in bioenergy as it has a diverse range of secure and stable supplies of biomass feedstock available which are capable of being readily utilised for energy production. A range of bioenergy generators currently operate in Victoria, using fuel sources such as agriculture, urban and industrial waste. These generators range from micro-scale at locations such as small farms to large-scale at industrial facilities.*

We and many other environment groups are extremely concerned regarding the addition of native forest wood, or biomass used to fuel forest furnaces, being defined as 'renewable energy' under the Federal Government's RET legislation. This allows an otherwise uneconomic industry to be marginally economic, while continuing to destroy the very thing Australia needs to protect to mitigate climate change - native forests as carbon capture and storage devices, not to mention soil holders, air purifiers, water filters, rain makers and biodiversity arks.

EEG wrote to the Premier on 13<sup>th</sup> August this year asking what his government's policy was on burning native forests as a 'renewable energy'. We have not received a reply, which is concerning.

We hope that the Andrews government will not go down this Tony Abbott path. We would urge the Victorian government to reject *any* material from native forests biomass burning, regardless of how the vested interests within the logging fraternity define it – 'waste' being the linguistic façade. Plantation waste is less of an issue, but any wood from native forests would be a major leap back into 15<sup>th</sup> Century technology and provoke major environmental campaigns against such a move.

We understand that Hazelwood, the country's dirtiest and most controversial coal-fueled power station is considering co-generation. As an antiquated generator, it would be able to



burn logs with varying moisture content without ill-effect on the generator (most generators require pelletised wood). The added pollution levels in the Latrobe valley from this new air pollutant would further decrease the already poor air quality. Burning wood is far less efficient and far more polluting than burning coal, for the same electricity output.<sup>1</sup>

Australian proponents and supporters of biomass (mostly the native forest logging industry) are positioning themselves to use our native forests for burning - domestically or for export to European or Asian countries. As coal and nuclear are increasingly unpopular, dirty operators are simply looking to forest furnaces. This push is also as a result of the loss of traditional woodchip markets. Woodchipping is a massively damaging and controversial industry that has created extreme conflict since its introduction in the early 70s. Forests must be seen now as valuable climate moderators, carbon capture and storage sites and possibly as profitable carbon banks.

Nathan Trushell from VicForests said in an interview with Radio National's [Background Briefing](#) program, at least in the short to medium term, biomass burning at Hazelwood is not the priority.

*"It may or may not be commercially feasible right now, but certainly I think that's where the opportunities exist".*

In an indication of ongoing interest in biomass for its Hazelwood plant, GDF Suez in October last year [advertised for a 'coal and ash operator' who would also 'participate in biomass trials'](#).

<sup>1</sup> <http://www.pfpi.net/trees-trash-and-toxics-how-biomass-energy-has-become-the-new-coal>

Charles D. Connor. President & CEO. American Lung Association. Letter to United States House of Representatives. June 24, 2009., Massachusetts Medical Society Adopts Policy Opposing Biomass Power Plants" December 9, 2009.

<http://www.massmed.org/AM/Template.cfm?>

<http://www.pfpi.net/american-lung-association-energy-policy-opposes-biomass-combustion-for-heat-and-power>

As stated before, science shows us that burning wood is far more polluting than burning coal for the electricity generated. On the contrary, research shows that standing trees and forests are the most effective, long term carbon capture and storage mechanisms we have, and cutting them down to burn is a double whammy against the climate. The [UK experience](#) teaches us that this type of power production is far more costly for the consumer as well, despite assurances and claims of cheaper power.

Include in any calculations regarding native forest biomass burning:

- the carbon cost of heavy machinery used to log forests,
- the remaining unwanted forest vegetation and tree heads burnt on site,
- the transport of logs on trucks,
- logs chipped, dried and pelletised,
- then transported to the power plants to burn,
- to create steam to drive the generators, to make electricity.

and this is clearly an extremely carbon costly way to boil the kettle! There are [reasons too numerous to mention](#) as to why burning forests to generate power is an insane proposition on many counts.

At the UN Climate negotiations recently, a [Working Paper](#) showing that burning forests for electricity is *not* carbon neutral was released by Chatham House, The Royal Institute of International Affairs. We know our Federal Government is not a fan of fact or science but we would hope we can have more faith in the Andrews government on these matters.

Further concerns regarding the use of forests in Victoria's 'renewables' mix include:

1. If Coal Co-firing develops, it is likely to be on a large scale

Given the operational scale of coal power stations, their processes are only likely to be able to accommodate an auxiliary wood waste stream if it is on a reasonable scale.

A 2011 study commissioned by the Australian Government Rural Industries Research and Development Corporation (RIRDC), estimated that wood waste would need to be about 3% by energy value (McEvelly).

For the Hazlewood power station, this target represents 446,836 tonnes of timber biomass annually (McEvelly 2011) or 4,272 hectares of forest (Adjani, 2011) – greater than the current amount logged in East Gippsland per year. (Vic Forests.)

Generation on this scale would also have a significant impact of the makeup of the RET, displacing genuine clean energies like solar and wind generation.

2. Coal co-firing has the potential to increase the net amount of native forestry

Developments in the forestry industry have seen the profitability of native forestry decline.

There is a general economic and political drive towards a transition towards plantation timber forestry that should be managed so as to preserve the valuable resource (biodiversity, carbon, climate, water etc) of Victoria's remaining forests.

The development of a native wood waste industry could slow down a productive transition to true renewables at the cost of losing significant natural heritage values.

Statements by the logging industry confirm that it would not be offcuts included in the "waste" for incineration, but pulp-grade logs – anything unwanted as a saw-log by the diminishing

number of mills (Bower, 2015). Off cuts, and branches are portrayed as the 'waste' to be used but are unsuitable for bioenergy, and are uneconomic to gather or transport.

3. Native forestry is not sustainable, and has significant climate and fire consequences.

Numerous infringements almost every year and through 2015 demonstrate that Victoria's native forest logging agency/s have failed. DELWP seem unable to enforce the most basic of environmental obligations. And it is in VicForests' commercial interest not to.

Numerous scientific papers demonstrate that old growth forests grow faster than young forests, and sequester more carbon. Victoria's mighty mountain ash forests have been classed the [most carbon dense in the world](#).

Old growth forest that is targeted by logging plans provides a [natural barrier to wildfire](#) – which apart from threatening Victorian lives, properties, towns and farms – also has dire carbon consequences. Logging has been shown to [increase fire risk](#), which can be especially deadly around communities.

Managing our forests for carbon storage and climate moderation has massive benefits if the Victorian government is serious about reducing our carbon output and encouraging clean energy. We are heartened by the new direction, but will strongly oppose any capitulation with the logging lobby and its claims of 'renewably' destroying our [carbon stores](#), water catchments and wildlife arks.

Sincerely,

A handwritten signature in black ink, appearing to read 'J Redwood', with a stylized flourish at the end.

Jill Redwood  
Coordinator