WWF for a living planet®

WWF-Australia
Level 13, 235 Jones St
Ultimo NSW 2007
GPO Box 528
SYDNEY NSW 2001

Tel: +61 2 9281 5515
Fax: +61 2 9281 1060

enquiries@wwf.org.au
wwf.org.au
ABN 57 001 594 074

Major Projects Assessments
NSW Department of Planning
Submission posted to Major Projects On-Exhibition webpage

22 April 2010

Dear Sir/Madam,

WWF Submission on the South East Fibre Exports (SEFE) 5MW Biomass fired power station

Thank you for the opportunity to make a submission in relation to the proposed SEFE 5MW biomass fired power station.

Summary

WWF does not support SEFE's proposed 5MW Biomass power station. WWF urges the Minister to reject the application until such time as:

1. Any biomass sourced from a native or natural forest be FSC-certified; and

2. A comprehensive full life-cycle analysis of the GHG emissions associated with the forest operations (providing the residue), the transport of biomass to the power station and of the power station operations has been completed and made available for public comment.

WWF Position on Bioenergy

Sustainable bioenergy forms part of the solution to climate change. WWF's Climate Solutions 2050 report found that 110 to 250 EJ of bioenergy could be produced globally each year by 2050 even while conserving the natural world and maintaining food security. This would represent between about one quarter and one half of all current global primary energy production and approximately 11 to 29 per cent of the projected final global demand in 2050[1].

[1] Approximately 1000 EJ according to the IPCC SRES A1B scenario or approximately 1/6 to 1/3 of all energy used in WWF's Climate Solutions for 2050, with ambitious energy conservation measures.

WWF for a living planet®

However great care must be taken to ensure that sources of bioenergy are environmentally, socially and economically sustainable, and effective measures must be place to address each of the following issues:

1. Bioenergy must deliver large positive energy and GHG balances over fossil fuel;

2. Bioenergy feedstocks must be selected on the basis of the most efficient GHG balance, from production through to processing and use;

3. Bioenergy policies and programmes must address displacement effects that influence GHG balance, poverty and the environment;

4. Bioenergy production areas must not be established through the conversion or degradation of natural ecosystems (natural and semi-natural forests, natural floodplains, peatlands) that have high conservation values and/or critical carbon storage functions;

5. Bioenergy feedstocks must be produced using better management practices (BMPs);

6. Implementation of bioenergy policies must take into account food security and must not threaten the realisation of the right to food;

7. Governments must take measures to ensure an equitable playing field for small producers; and

8. Social considerations and indigenous people's rights must be considered as a priority in bioenergy development.

In relation to bioenergy feedstock, standards of extraction or production of the feedstock need to ensure:

- High Conservation Value Areas and other habitats important for biodiversity conservation are maintained;

- Soil health is not adversely affected;

- No adverse impact on quantity and quality of freshwater resource;

- No release of toxic compounds into the environment; and

- A substantially positive life-cycle GHG balance (compared to fossil fuel equivalents) is delivered.

WWF *for a living planet®*

Bioenergy feedstock from natural and semi-natural forests

In this case, the bioenergy feedstock is proposed to be drawn from natural forests. WWF believes that the Forest Stewardship Council (FSC) provides the most reliable assurance that high conservation value areas, soil health and water quality are maintained. The present operations are not certified under the Forest Stewardship Council Principles and Criteria.

The supporting material also does not appear to provide a sufficiently comprehensive full life-cycle analysis of the GHG emissions associated with the forestry operations. While it is true that the biomass proposed to be fired is said to be residual waste, the scale of the operation cannot be said to be trivial and therefore it is appropriate that a full life-cycle GHG analysis should be undertaken by an independent third party. Furthermore, WWF does not support forest-based biomass which is not FSC certified being eligible for Renewable Energy Certificates (RECs).

Yours sincerely

Paul Toni
Program Leader – Development and Sustainability