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**Nature Reserves Preservation Group  
of Kalamunda, Inc.**

21 Oct 2022

**TO: Australian Government, Dept of Climate Change, Energy, the Environment and Water  
[renewableenergy@industry.gov.au](mailto:renewableenergy@industry.gov.au)**

**CC:**

**SUBJECT: Submission on the Native Forest Wood Waste in the Renewable Energy Target**

The Nature Reserves Preservation Group of Kalamunda (NRPG) is a non-profit community organisation which has worked for 30 years to preserve the natural areas in Kalamunda and surrounds. As such we recognise that our Native Forests are incredibly precious, biodiverse and globally unique, and they have been subject to extensive clearing and logging over the past 200 years.

Our native forests and linkages between these ecosystems, waterways, cultural heritage, wildlife habitat and regrowth and rehabilitation areas are critically important for climate, biodiversity, water, culture and communities.

The cumulative impacts of forest logging/thinning, mining, Dieback and other human activities have damaged our native forests in W Australia permanently, including that Climate Change has also now changed the growing conditions, and continued human activities are a serious threat to our forests' long-term viability.

The NRPG strongly opposes the accreditation of power stations to create LGCs under the Renewable Energy Target (RET) by the use of wood waste from native forest activities. This is of serious concern because it perpetuates industries which are particularly unsustainable as noted above, in the present context of our declining Environment, as confirmed by the 2021 State of the Environment Report.

In W. Australia the logging and mining in native forests is claimed to be sustainable but the evidence shows that regrowth as assumed or claimed is incorrect in its recovery rate and biodiversity. Climate Change has changed the conditions which allowed the forests to grow originally, and therefore assumptions of regrowth are erroneous.

While biomass energy is theoretically 'renewable energy', the wider considerations raise serious questions and issues, including the following:

- Whether the rate at which biomass is combusted (and/or loss of soil carbon and other factors), is greater than the CO<sub>2</sub> bio-sequestration by new tree growth. Given the urgent need to reduce emissions in the next 10-20 yrs, this difference can result in increased emissions. Even if the emissions were considered carbon-neutral, this does not contribute to reducing emissions which other forms of renewable energy such as wind and solar do actually achieve. (Their 'carbon footprints' (energy rate of return) are typically neutral after operating only months to a year or so, after which their emissions are very close to zero, and by displacing fossil fuel generation, this results in decreasing emissions overall).
- That the energy required to harvest and transport wood biomass is not accounted for in the calculation of the renewable energy generated, and so the true emissions are higher.
- Biomass energy plants are typically highly polluting compared to large coal plants.  
(<https://www.pfpi.net/trees-trash-and-toxics-how-biomass-energy-has-become-the-new-coal> )
- Human activities in our native forests have impacts such as habitat destruction and disturbance, soil compaction, spread of Dieback and weeds, reduces forest capacity to safely store carbon out of the atmosphere for hundreds of years.
- Refer also:
  - WA Forest Alliance: <https://wafa.org.au/wp-content/uploads/2020/07/FACT-SHEET-Biomass-for-energy.pdf>

- Australian Conservation Foundation:  
<https://www.acf.org.au/ten-reasons-why-burning-native-forests-for-electricity-should-not-be-included-in-the-ret> )
- The Wilderness Society [TWS Briefing note Burning Forest for Electricit .pdf](#)

In summary, the NRPG urges that no native biomass be allowed accreditation under the RET, and that instead, solar PV and wind (along with associated technologies and storage) should be the focus because they are not only more economic, are 'carbon-negative' after a short period, and can be installed in non-environmentally-sensitive areas, to meet our energy needs. The Australian Energy Market Operator is planning for this transition toward a 100% renewable energy supply through the "Integrated System Plan" [AEMO Factsheet landscape](#). (See also from Renew Economy <https://reneweconomy.com.au/australia-is-racing-towards-100-per-cent-renewables-what-does-that-look-like/> )

Yours faithfully,

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