

Padovan John

From: Lisa Head <lisa@astfloors.com.au>
Sent: Saturday, 10 August 2013 9:02 AM
To: EPA Continuous Improvement Unit Mailbox
Subject: Submission
Attachments: EPA August 2013.docx

Please find attached submission regarding changes to the *Protection of the Environment Operations (General) Regulation 2009* from Australian Solar Timbers.

Kind Regards
Lisa Head

Business Support Manager
lisa@astfloors.com.au
Australian Solar Timbers
0418 285 123
www.astfloors.com.au



Postal
PO Box 92
West Kempsey NSW
Australia 2440

Street
116 Armidale Road
West Kempsey NSW
Australia

T +61 2 6562 6839
F +61 2 6562 8302
info@astfloors.com.au



ABN 62 075 415 904
www.astfloors.com.au

9 August 2013

Native Forest Biomaterial Consultation

Reform and Compliance Branch

Environment Protection Authority

PO Box A290

Sydney South NSW 1232

Dear Sir/Madam

I wish to make a submission to the "Draft *Protection of the Environment Operations (General) Amendment (Native Forest Bio-material) Regulation 2013*" to **support** the proposed two additional types of biomaterial being available to be used for the production of electricity as outlined in the draft regulations.

Australian Solar Timbers (AST) operates a timber processing centre at Kempsey which, in normal times, employs 100 people although currently this is about 50. It specializes in flooring production and since 1993 has operated the world's largest solar kiln drying timber operation. AST has based its business model around innovation and environmental values. It invested heavily in the Co-operative Research Centre Wood Innovations (where I served as Deputy Chair for 5 years) and pioneered solar kiln drying. We have appeared on the ABC's "New Inventors" program as heat winners and I have been invited to speak at the 2011 ABARES Conference on "The Future of the Hardwood Industry". AST has been involved in the development of cogeneration through biomass, engaging with the Newcastle based innovative technology company, The Crucible, which has just commissioned a commercial pilot with Delta Energy at Vales Point with Federal Government assistance.

It should be patently clear that it is advantageous to enable invasive native species that have been cleared to produce electricity. What is hard to understand is why they were ever excluded in the first place. Surely this will only make it more viable to promote their removal and improve environmental outcomes in a shorter timeframe.

Similarly we support biomass emanating from forestry operations under IFOA being available for electricity production. This will have multiple benefits other than the enhancement of the State's production of renewable energy through biomass generated electricity.

The removal of forest debris will decrease fuel load build up thereby reducing the risk of, or intensity, of bush fires and consequent forest cover. It will also promote more rapid forest regrowth by opening up ground space subject to direct sunlight. This assists more effective silviculture and enables more viable economics to promote better forest management, including expansion of our forest base cover. Access to this additional resource (which is currently being wasted) will make the development of regionally based renewable energy operations more viable.

AST has investigated the development of a 2 megawatt cogeneration facility at its Kempsey site which, using existing mill residues, would make us self sufficient in electricity production and onsite usage. Access to forest residues would make this concept expandable to provide electricity to the entire Macleay Valley and would develop economies of scale to assist the investment model. This concept would be repeatable in numerous biomass rich areas and could incorporate landfill residues as are currently required to be sorted in numerous European countries. This will further develop the economics of renewable.

As the International Energy Agency and International Panel on Climate Change reported in 2007, woody biomass is currently by far the biggest source of world renewable energy production at 78%. This is widely underappreciated in Australia where the focus remains on solar and wind, neither of which produces reliable base load power and both of which are more expensive by a factor of about 7.

These proposed regulatory draft amendments in no way impact on the environmental protections currently imposed on harvesting operations and will maintain existing controls on timber harvesting. They will enable the reduction in needless waste of harvested residues, promote the expansion of renewable energy opportunities in regional NSW and ultimately improve environmental and economic efficiencies in NSW forest operations. These proposed regulation changes mark a return to scientific based environmental reform and deserve support,

Sincerely

Dr Douglas Head

Director AST