Chris Moscrop
Planning Department
Weymouth and Portland Borough Council
Council Offices
North Quay
Weymouth
DT4 8TA

17 August 2009

Dear Mr. Moscrop,

Re: plans by W4BRE Limited to build an Energy Plant adjoining Balaclava Bay. Application No. 09/00451/LBC

I am writing on behalf of Biofuelwatch to object to the plans submitted by W4BRE Ltd to build a "Green Energy Plant" at Balaclava Bay, which is to burn virgin vegetable oil, primarily palm oil from South-east Asia.

The applicant states that the development will consume up to 40,000 tonnes of fuel per year. This volume is approaching 4% of the biodiesel supplied to the UK transport market at the moment to be blended with petrol-diesel.

Biofuelwatch is primarily concerned about the impacts of this large additional demand for biofuels on the global climate; on communities in the global South, for example in Indonesia, Papua New Guinea, Malaysia and Colombia; and on the life-support systems which underpin global biodiversity. We therefore focus on those impacts in our objection.

The basis of our objection

1. There is now universal acceptance by scientists and politicians that global warming is changing the climate, and recognition that all developments that have more than minor climate impacts ought to be considered from a global perspective. Regarding renewable energy specifically, the UK government's Planning Policy Statement 22: Renewable Energy (PPS22) states as one its key principles that:

'(iv) The wider environmental and economic benefits of all proposals for renewable energy projects, whatever their scale, are material considerations that should be given significant weight in determining whether proposals should be granted planning permission.'

We believe that if wider environmental ***benefits*** are to be treated as material considerations in considering a planning application, then so should wider environmental ***impacts***.

2. The European Directive on Environmental Impact Assessments provides that EIAs must consider all direct and indirect impacts on humans, fauna, flora, soil, water, air, climate, cultural heritage and material assets, see:

http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:1985L0337:20030625:EN:PDF

The Environmental Statement provided by W4BRE is inadequate as it does not consider ***all*** direct and indirect impacts as required by the Directive.

3. Furthermore, the W4BRE application should be considered in the light of the Council's statement in its 2008 – 2013 Corporate Plan, which acknowledged the need to consider the impact that local activities have on global changes to the environment:

"The Council, communities and local businesses need to work together to reduce the impact our activities have on local and global changes to the environment. For example, there are few places

where the effects of sea level change could be more significant in the longer term than Weymouth and Portland"

4. In Biofuelwatch's view, the proposed development will have significant adverse environmental social and economic impacts at a global level. We believe these are material considerations in determining this application and that the Council should refuse consent.

PALM OIL AND OTHER BIOFUELS

The use of biofuels for generating electricity is currently designated by UK Government as renewable energy. However, there is a growing body of evidence and scientific opinion that challenges the basis of this designation. Scientific research as well as first hand experience from affected communities worldwide has shown that the large scale use of biofuels is fundamentally unsustainable and leads to catastrophic social and environmental impacts.

Several recent peer-reviewed scientific papers report that the overall impact of burning biofuels is actually worse for the climate than burning equivalent amounts of fossil fuels. This is due to the strong global warming impact of nitrogen fertilisers used in growing industrial-scale biofuels, and to the large amounts of carbon dioxide emitted when natural ecosystems and healthy soils are turned into biofuel plantations:

- According to a study by Nobel Laureate Paul Crutzen, biofuels from rapeseed oil are up to 70% worse for the climate than the equivalent amount of mineral oil, due to nitrous oxide emissions caused by fertiliser use. This figure does not take indirect land use change into account

- Converting rainforests, peatlands, savannas, or grasslands to produce food-based biofuels, such as palm oil and soya in Brazil, Southeast Asia, and the United States creates a 'biofuel carbon debt' by releasing many times more CO_2 than the annual greenhouse gas reductions these biofuels achieve by displacing fossil fuels. Joseph Fargione of the University of Minnesota calculated that biofuel from palm oil grown on forest land leaves a carbon debt of 86 years and for palm oil grown on peat land this figure increases to 840 years.

- According to the Stern Review, nitrous oxide and methane emissions from industrial agriculture account for 14% of all global greenhouse gas emissions.

Official statistics currently omit all 'indirect land use change' emissions despite a major Government report (the Gallagher Review in 2008), identifying them as one of the main drawbacks of crop-based fuels:

www.dft.gov.uk/rfa/reportsandpublications/reviewoftheindirecteffectsofbiofuels.cfm .

It is impossible to ensure that biofuel feedstock is not grown directly or indirectly at the expense of forests, grasslands or peatlands, nor is it possible to fully account for the very significant greenhouse gas emissions that arise from land conversion.

Without taking account of these large direct and indirect land use change emissions, it is not possible to accurately assess the full environmental impact of producing biofuels, and it is therefore presumptuous to describe them as sustainable.

W4BRE state in their application that they will use palm oil from Southeast Asia, and indicate they may also use other types of imported vegetable oil. Like palm oil, the production of soya oil and jatropha (a crop that is being expanded even though it does not generally produce commercial yields), also has severe adverse impacts on the environment, and on social and economic conditions in producing countries.

W4BRE claim that they will use "sustainably" sourced fuel, but in such large quantities, it is extremely doubtful that any fuel source is truly sustainable. In particular, increasing the demand for palm oil will lead to further expansion of an industry which is already responsible for large-scale deforestation, major carbon dioxide emissions, evictions and human rights abuses, more hunger, serious biodiversity losses and pesticide poisoning.

Impacts of palm oil

CLIMATE: According to the United Nations Environment Programme, palm oil is the biggest driver of deforestation in Malaysia and Indonesia, see:

http://www.unep-wcmc.org/resources/publications/LastStand.htm

Largely due to Europe's growing demand for biofuels, the Indonesian government is planning to expand oil palm plantations by 20 million hectares. According to Wetlands International, over half of all new oil palm concessions in Indonesia and Malaysia are on peatlands. In order to grow oil palms, the peat is drained and this commits all of the carbon sequestered in the peat to the atmosphere. Plantation companies commonly set fires to speed up the process. Peat expert Professor Florian Siegert of Munich University estimated that the emissions from such fires accounted for 15% of all global greenhouse gas emissions in 2006. Professor Siegert said the following about the use of palm oil for generating heat and power in Germany:

"*We were able to prove that the making of these plantations and the burning of the rain forests and peat areas emits many thousands of times as much CO2 as we then are able to prevent by using palm oil. And that is a disastrous balance for the climate.*"

See: http://de.indymedia.org/2007/03/170912.shtml

HUMAN RIGHTS AND HUNGER: EU legislation prescribes how biofuels used in the UK are to be assessed for sustainability, which in turn allows the UK government to give them financial subsidies. This legislation ignores key factors that are frequently associated with overseas biofuel production: all human rights abuses, increases in food prices and in the number of people going hungry, abusive working conditions and slavery-like conditions - common for example amongst Indonesian migrant workers on oil palm plantations in Malaysia.

According to Watch Indonesia!, 45 million people in Indonesians depend on rainforests for their livelihoods. Oil palm plantations could eventually create up to 10 million jobs but this would leave 35 million people destitute. Evictions are common; many of them violent, and according to the Indonesian NGO Sawit Watch, there are already 576 land conflicts in Indonesia linked to oil palm plantations:

www.sawitwatch.or.id/index.php?option=com_content&task=view&id=79&Itemid=64&lang=english .

Pesticide poisoning leading to acute and chronic illness and even death is common on oil palm plantations and often involves pesticides which have been banned in the EU because of the health risks, such as the highly toxic Paraquat.

A World Bank report in 2008 indicated that biofuels caused 75% of global food price inflation:

www.guardian.co.uk/environment/2008/jul/03/biofuels.renewableenergy .

BIODIVERSITY DESTRUCTION: Not just Orangutans but many thousands of species are threatened with extinction as a result of deforestation. NGOs including Greenpeace and the Centre for Orangutan Protection have shown that even those palm oil companies who are members of the Roundtable on Sustainable Palm Oil are also responsible for the destruction of Orangutan habitat.

Accreditation of biofuels as sustainable

W4BRE state that they aim to use palm oil accredited with the Round Table on Sustainable Palm Oil (RSPO). The fact that the RSPO organisation has been specifically created to try to classify some palm oil as sustainable confirms that most palm oil is unsustainable. More than 250 organisations have condemned the RSPO, describing it as "yet another attempt at camouflaging and denying the true situation, providing 'a green-wash' to make a model of production that is intrinsically destructive and socially and environmentally unsustainable, appear to be "responsible." :

www.biofuelwatch.org.uk/docs/17-11-2008-ENGLISH-RSPOInternational-Declaration.pdf

When the first batch of certified 'sustainable' palm oil, from Malaysia was released in November 2008, Greenpeace made this comment:

"The granting of the first sustainability certificate by the Roundtable on Sustainable Palm Oil (RSPO) to United Plantations seems little else but a cover up of business-as- usual including land grabbing, deforestation, peatland conversion, and the violation of Indonesian law."

www.greenpeace.org.uk/files/pdfs/forests/UnitedPlantationsReport.pdf

Biofuelwatch similarly believes that RSPO accreditation provides no meaningful assurance of sustainability because:

- Large-scale oil palm plantations are inherently unsustainable since they require the conversion of either natural or farmland, support no biodiversity, and require large quantities of agro-chemicals which pollute water, soil and very often people.

- In Indonesia, the palm oil industry has used the RSPO as a reason to oppose a moratorium on deforestation and peatland destruction. Their stance influenced the government to open up more peatlands to destruction, which will ultimately release millions of tonnes of carbon into the atmosphere.

- The RSPO certification process is not applied rigorously and in accord with the original intentions. Oil palm plantations have already been certified despite serious breaches of the RSPO Principles and Criteria. Plantations established before 2007 can now become certified, even though they have been grown on previous forest lands and there is no robust verification which would prevent palm oil from ongoing deforestation being certified. Toxic Paraquat use can also be certified as 'sustainable'.

- The RSPO certification scheme allows companies to certify individual plantations, avoiding overall assessment of their whole production. They can use a 'showcase' plantation to present themselves as being environmentally responsible although in other areas they act in an irresponsible social and environmental manner. Under RSPO rules they can have palm oil, which is produced on a plantation where forest was cut down previously, certified as 'sustainable', while at the same time destroying more forest for the uncertified market.

- Most palm oil is produced by large corporate groups that own hundreds of thousands of hectares of oil palm plantations. The RSPO does not require all producers to get the entirety of their estate certified at once. Companies are required to have a 'realistic and adequately' ambitious plan for certifying their other plantations, if they have ownership of more than 51% of that plantation, but since RSPO has not set a timeline for this, RSPO members can avoid taking any steps towards the certification of their land. Furthermore, uncertified members can remain members of RSPO.

- RSPO allows its certified palm oil to be traded through different chains of custody schemes, from 'identify preserved' to 'book and claim'. This means that RSPO certified palm oil will be mixed with palm oil from other sources, making it virtually impossible for a purchaser to ensure that the palm oil is not linked to rainforest destruction, other environmental degradation and social conflict.

- The RSPO has failed to develop appropriate standards for greenhouse gas emissions associated with plantation development and management. In addition, RSPO has failed to undertake a study on alternatives to using the extremely poisonous Paraquat herbicide.

- Ultimately, the RSPO will be endorsing as sustainable the cultivation of vast areas of oil palm monocultures, where only some pockets of original forests might be maintained. Local communities, who refused to accept oil palm, will be isolated in small areas surrounded by plantations. It will be possible for companies to expand their plantations, as long as there are no High Conservation Value Forest (HCVF) areas that have been converted after 2007.

- The RSPO does not have any sanctions against violations of their criteria at plantation level.

- There is no permanent monitoring body. Only when there is a written complaint will a grievance panel be established to research and provide recommendations for action by the RSPO. The Grievance Panel is composed of Executive Board members who are stakeholders rather than mediators or arbiters. NGOs and local communities are given very limited powers to respond to failures identified at individual plantations or at a wider level.

We also note that W4BRE mention that other oils might be used in the power station, but fail to specify these. They simply state that "the Roundtable for Sustainable Biofuels will provide similar accreditation for any other oils proposed for use."

This is a meaningless commitment at a time when the Roundtable for Sustainable Biofuels has yet to agree on any standards and at the same time the roundtable process is questioned by organisations around the world for failing to involve civil society from producer countries.

Conclusion

1. All industrial-scale biofuels, whether imported or domestically grown, cause more greenhouse gases than equivalent fossil fuels and therefore will only exacerbate dangerous climate change. (see www.biofuelwatch.org.uk/docs/lca_assessments.pdf).

2. Increasing the use of biofuels makes it harder to save the tropical rainforests.

3. Biofuels lead to rising food prices, world hunger and human rights abuses.

4. We dispute W4BRE's claims that its fuel supplies will be sustainable. It intends to use palm oil as a fuel, which is responsible for large-scale deforestation, major carbon dioxide emissions, evictions and human rights abuses, more global hunger, serious biodiversity losses and pesticide poisoning.

If approved, this development will have very significant adverse consequences for the environment and for people in the South for decades to come.

We urge you to take these wider implications into account when considering W4BRE's proposals, and to reject their application.

Yours sincerely,

Robert Palgrave

Biofuelwatch.