Suggestions for lobbying your MP/AM about the ROCs Banding Consultation

Note: The DECC Consultation on changes to the Renewables Obligation banding (i.e. changes to which types of energy classed as renewable should attract which level of subsidies) has been published and runs until 12th January 2012. The consultation paper can be downloaded from www.decc.gov.uk/en/content/cms/consultations/cons_ro_review/cons_ro_review.aspx . For a background briefing on bioenergy and waste in the Renewables Obligation and proposed changes, see For a discussion of the impacts of Renewable Obligation Certificates (ROCs) for bioenergy and waste, see www.biofuelwatch.org.uk/2011/rocs_impacts .
A longer guide which you may wish to hand to your MP or AM can be found at http://www.biofuelwatch.org.uk/2011/rocs_mps/ .
For people in Wales: The DECC Consultation relates to ROCs for England and Wales. Although this is not a devolved issue in Wales, you may wish to raise your concerns with both your MP and AM.
For people in Scotland: This is a devolved matter in Scotland and the Scottish Government has issued a separate consultation. Please contact us for more information on how to respond to that. However, please still contact your MP about the DECC consultation, too because biomass and biofuel power stations affect people, forests and the climate worldwide.

General note on lobbying your MP/AM:

If possible, we would recommend a personal visit to your MP/AM for greatest impact. You may wish to hand your MP our more detailed guide or impacts briefing, too. If you are not able to visit your MP/AM please send a personal letter instead. Although Biofuelwatch will set up a simple email alert, personal letters are more effective than standard ones. Please refer to the Biofuelwatch briefings listed above for references and background information.

Introduction

The consultation states: '*One of the primary aims of the banding review is to 'contribute to the effective delivery of wider energy and climate change goals to 2050, including Greenhouse Gas (GHG) emissions reductions, decarbonising of the UK grid and energy security*'.

Your MP or AM may need persuading about the adverse affect of industrial bioenergy. It may help to leave them our impacts briefing paper. Clearly the point of the Renewable Obligation is that energy needs to be renewable, sustainable and climate friendly. You may find these points will help convince doubting politicians:

- In contrast to other renewables like wind and solar, biofuel and biomass produce carbon from combustion, processing, transport and land use change. Indeed, the upfront carbon emissions from burning biomass are around 50% higher than those from burning coal per unit of energy and that carbon will not be re-absorbed by new trees and other plants for decades or centuries, if ever.
- Unlike other renewables, bioenergy produces significant levels local air pollution affecting health in this country, as well as black carbon (soot) which accelerates polar ice melt. Per unit of energy, biomass burning produces similar levels of air pollution as coal burning – but even higher levels of nitrogen dioxide and small particulates which are linked to respiratory and heart disease.
- Biofuel and biomass are not 'renewable' because they require land to be dedicated for decades to growing energy crops, taking land out of use for growing food.

- The production of biofuels and biomass overseas is associated with human rights abuses, land grabs, rainforest deforestation, malnutrition, soil & water pollution.
- Biomass power generation is a highly inefficient process. Up to 75% of the energy available in the biomass is wasted as heat.
- The energy generated by incinerating waste is a small proportion of that which would be saved by recycling and reducing the same materials, while causing emissions of a particularly large range of dangerous toxins. Under EU legislation, energy from fossil-fuel derived waste is not renewable so including it into the Renewables Obligation may even contravene EU law.
- The Government proposes a cap on subsidies for bioliquids (liquid biofuels, mainly biofuels). That cap would be equivalent to five 50 MW biofuel power stations. If those were run exclusively on palm oil (by far the cheapest vegetable oil), they would require at least 110,000 hectares of new oil palm plantations. For other types of vegetable oil, even more land would be needed. This will mean more deforestation (directly or indirectly) and more land-grabbing.

Issues from the Consultation

- The consultation highlights that the UK has among the best wind resource in Europe; wind is a free resource (biofuels & biomass are a globally traded commodity that competes with land required to grow food.
- DECC recognize that there are many other uses for biomass and that the overwhelming majority of wood will be imported.
- Even though burning biomass creates 50% more upfront carbon emissions than coal, much of which will not be sequestered again for decades or centuries, if ever, the government would like all coal to convert to biomass. The Committee on Climate Change have advised there is no place for biomass for electricity after 2020 due to carbon emissions, plant efficiency and security of feedstock due to lack of global land.
- Reporting criteria for biofuels sustainability ignore most adverse affects, including all indirect impacts and claims by companies' consultants that their biofuels meet sustainability standards will not be independently audited, making the standards meaningless.
- DECC recognize that ROCs for Anaerobic Digestion could lead to expansion of food crops for biogas but they are not proposing to address this. In Germany, blanket subsidies for biogas regardless of feedstock (as supported by DECC at present) have led to large-scale land conversion for maize for biogas, making this a key driver for biodiversity losses as well as competing with food and feed. Other countries such as the Netherlands have decided to restrict biogas subsidies to biogas from waste ony.
- The consultation suggests that finance is the only issue that parliament need consider during the scrutiny process. It omits to inform the public that when reviewing ROC banding, the Secretary of State must consider sustainability and carbon emission reduction. The UK Renewable Energy Roadmap talks of focusing on the most sustainable technologies.

Action

When speaking with your MP, it might be worth mentioning the draft regulation will be subject to the 'Affirmative Resolution' procedure, which means it will require positive approval by Parliament. We are calling on MP/AMs to say **NO** to ROCs for biofuels, biomass, energy from waste & advanced conversion technologies. Please call on your MP/AM to:

- Lobby DECC during consultation to express concerns over sustainability (and the fact that this has been ignored in the consutlation) and call for no ROCs for biomass, bioliquids, waste incineration or biogas from energy crops grown for that purpose.
- Call for a debate on the issue & a full parliamentary vote or committee that votes.
- Vote against ROCs for biofuels, biomass and waste incineration if the opportunity rises.