

## Briefing for responding to the ROCs consultation (Scotland)

**Note: A Scottish Government consultation on changes to the Renewables Obligation banding runs until 13th January 2012. The consultation paper can be downloaded from [www.scotland.gov.uk/Publications/2011/10/27123530/8](http://www.scotland.gov.uk/Publications/2011/10/27123530/8)**

**For more information about the subsidy scheme in Scotland, see [http://www.biofuelwatch.org.uk/2011/rocs\\_introduction\\_scotland/](http://www.biofuelwatch.org.uk/2011/rocs_introduction_scotland/)**

**For more information about the environmental and human rights impacts of biomass and biofuels, see [http://www.biofuelwatch.org.uk/2011/rocs\\_impacts/](http://www.biofuelwatch.org.uk/2011/rocs_impacts/)**

**Submit your response by completing the Respondent Information Form in Annex A of the consultation document, and sending it to:**

***Neal D Rafferty, Renewables Routemap Team, 4th Floor, 5 Atlantic Quay, 150 Broomielaw, Glasgow G2 8LU or email it to [Neal.Rafferty@scotland.gsi.gov.uk](mailto:Neal.Rafferty@scotland.gsi.gov.uk)***

**Our main concerns with the consultation can be summarised as follows:**

1. 82.5% of energy classed as renewable in the UK already comes from bioenergy and the proposals for long-term subsidies for renewable electricity will maintain this bias. High levels of biomass subsidies will remain, despite the Scottish government's proposal to put a cap threshold on large scale dedicated biomass. Note that even if 'large-scale' dedicated biomass power stations are not eligible for subsidies in the future, power stations which are below the cap will still be eligible for subsidies, which will still mean that Scotland will still be in the position of importing more wood than it can supply on a local, sustainable scale. The biomass power stations already announced across the UK will burn around 60 million tonnes of wood a year – more than six times the amount of wood produced annually in the UK. This will, directly and indirectly, mean more deforestation across Europe, North America, West Africa, South America, etc and thus more climate change more land-grabbing for new tree plantations in the global South, and more air pollution and ill health in the UK.
2. The Consultation even proposes to give higher subsidies for coal power stations that co-fire 15% or more biomass. This proposal alone is likely to increase the UK's future wood demand by tens of millions of tonnes.
3. The Consultation proposes to continue offering subsidies for biofuels - most likely palm oil - for electricity. So far, no such power stations have been planned in Scotland but about a dozen have been proposed in England and Wales. There, the Government is proposing to at least cap the overall amount of biofuel electricity that attracts subsidies, but the Scottish Government has not mentioned any concerns about biofuels, nor committed itself to any cap. So, in future, companies may well evade the cap south of the border by planning large palm oil power stations in Scotland.

If only those biomass and biofuel power stations already announced were built by 2020 in the UK, those would attract some £3 billion in subsidies every year throughout the UK, and £500 million in Scotland, even though they will worsen climate change and have a disastrous impact on forests, people and communities, including, through greater air pollution, in the UK.

See [www.biofuelwatch.org.uk/2011/rocs\\_impacts](http://www.biofuelwatch.org.uk/2011/rocs_impacts) for more details about the impacts of electricity from biomass, biofuels, biogas and waste.

**Here are some key points we would suggest to put in your consultation response:**

- ⤴ ROCs for electricity from biomass, bioliquids and waste should be abolished because of their serious impacts on climate, people and, in the case of biomass and bioliquids, forests, grasslands, food (with new plantations often competing for or taking over farmland), water and soils.
- ⤴ 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.
- ⤴ Biomass electricity is highly inefficient – according to DECC, biomass power stations are only around 25% efficient. Together with biofuels, biomass electricity has by far the greatest 'land footprint' i.e. needs far more land per unit of energy compared to all other energy sources.
- ⤴ For bioliquids, experience in Germany and Italy shows that palm oil is the only economically viable feedstock, even with subsidies. This will mean more rainforest destruction and land-grabbing and more human rights abuses in countries such as Indonesia, Cameroon and Colombia.
- ⤴ For biogas, the Government wants to continue to offer the same high subsidy level for biogas from energy crops as from waste. In Germany, similar subsidy rules have led to large-scale conversion of land to maize grown just to make biogas. This is a key driver of biodiversity destruction in Germany and leads to competition with food and feed. DECC recognise this threat – but do not propose to address it. By contrast, the Netherlands has restricted biogas subsidies to certain types of waste only.
- ⤴ Waste incineration will be continue to be eligible for ROCs despite the serious implications for air quality and human health, for recycling rates and resource use, and even though under EU legislation it cannot be classed as renewable energy.

**Below are some suggestions for answering the key questions:**

**What are your views on our proposal not to incentivise new large scale dedicated biomass electricity? Under which circumstances under would it be appropriate to set a threshold for electricity only generation? At what level should any threshold be set?**

The Government should remove subsidies for all biomass, irrespective of scale. This is because, if subsidies remain available for dedicated biomass power stations falling under the set threshold, it is highly likely that Scottish biomass power stations will still depend on importing wood, putting pressure on the world's forests. Between 2012-2016, Scotland will have a very limited amount of biomass available from domestic supplies (867,100 tonnes), which would only be enough to sustain a very small number of biomass power stations. So, for example, just two 40MW power stations would use all of this would to sustain their demand.

Moreover, electricity-only biomass power stations are highly inefficient, with 25-30% efficiencies. The European Union recommends that Member States encourage biomass power stations which can achieve a minimum of 70% efficiencies (Article 13(6) of the Renewable Energy Directive) and so subsidizing electricity-only biomass power stations would be in breach of EU recommended standards, on top of being in breach of the Scottish Government's own policy on biomass.

**What are your views on:**

- **whether or not our incentives under the ROS in Scotland should mirror the UK Government's proposals on enhanced co-firing and conversion?**
- **whether a maximum threshold for biomass CHP plants is required?**
- **the continued appropriateness of the 90% biomass content threshold?**

**Co-firing:** The Scottish Proposals to mirror the UK on enhanced co-firing and conversion would see new subsidies for coal-fired power stations that supply at least 15% biomass. Effectively, this entirely undermines the Scottish Government's stated commitment to using biomass on an appropriate scale. For example, if Cockenzie Power Station and Longannet were to supply 15% biomass, they would effectively be generating 540MW from biomass, which would require over 5 million tonnes of wood per year – a scale that would rely heavily on imported wood putting pressure on the world's forests. Again, our concerns that the Government would be in breach of the EU recommended standards for efficiency remain, as biomass-only plants would remain subsidized.

**Biomass with CHP:** Nor should biomass CHP plants be subsidized under any circumstances. Firstly, biomass CHP plants currently receive subsidies for providing low levels of CHP which do not make plants reach the requisite level of 70% efficiency, and the government does not propose to revise the definition of CHP to include high levels of CHP. But more importantly, whilst it is true that CHP allows more of the energy produced to be harnessed as heat, this does not negate the other serious environmental and human rights concerns related to the large-scale use of biomass.

These concerns are namely: (1) Biomass often produces more carbon dioxide emissions than fossil fuels, and the system by which carbon emissions are accounted for has been criticized by the European Environment Agency's Scientific Committee and flawed; (2) Biomass pressures the world's forest supplies. Even if wood is obtained from certified sources, the demand for wood displaces other users with the net result that deforestation of tropical and sub-tropical regions will accelerate due to the additional demand and (3) the demand for land overseas posed by demand for biomass is threatening people's right to self-determination over their land and food.

**The 90% biomass content threshold:** This question is not considered relevant, as biomass simply should not be subsidized under any circumstances, irrespective of the organic content of the fuel in question.