

## Suggestions for lobbying your MSP about the ROCs Banding Consultation

**Note:** The Scottish Government 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 13<sup>th</sup> January 2012. The consultation paper can be downloaded from

<http://www.scotland.gov.uk/Publications/2011/10/27123530/0>.

For a background briefing on bioenergy and waste in the Renewables Obligation and proposed changes, see [www.biofuelwatch.org.uk/2011/rocs\\_impacts](http://www.biofuelwatch.org.uk/2011/rocs_impacts) .

For an in-depth briefing on what has been proposed by the Scottish Government, see [http://www.biofuelwatch.org.uk/2011/rocs\\_introduction\\_scotland/rocs-scotland/](http://www.biofuelwatch.org.uk/2011/rocs_introduction_scotland/rocs-scotland/)

### General note on lobbying your MSP:

If possible, we would recommend a personal visit to your MSP. You may wish to hand your MSP our more detailed guide or impacts briefing, too. If you are not able to visit your MSP 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: *'Scotland has enormous green energy potential - our natural resources comprise a quarter of Europe's tidal and offshore wind potential and a tenth of its wave power, a potential which sits alongside the legacy of Scotland's traditional energy industries.*

*That is why we have set an ambitious target for the equivalent of all of Scotland's electricity needs to come from renewables by 2020, one of the most demanding anywhere in world..*

Your MSP may need persuading about the adverse affects 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 Scottish Government has proposed to scrap ROCs for large dedicated biomass and possibly also dedicated biomass with CHP. This may make the controversial Forth Energy biomass proposals for Rosyth, Dundee, Leith and Grangemouth commercially unviable. However, this may simply see more biomass plants which are under the cap threshold.
- The Scottish Government has proposed new subsidies for co-fired biomass, which could see large quantities of biomass burned in co-fired power stations.
- The UK Government proposes an overall cap on subsidies for bioliquids (liquid biofuels, mainly biofuels). Such a cap has not been proposed in Scotland. This may have the effect of encouraging bioliquids power stations north of the border, meaning mean more deforestation (directly or indirectly) and more land-grabbing.

### **Issues from the Consultation**

- The consultation highlights that Scotland has enormous potential for renewables, with natural resources comprising a quarter of Europe's tidal and offshore wind potential and a tenth of its wave power. Biofuels & biomass are a globally traded commodity that competes with land required to grow food.
- 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 European Environment Agency Scientific Committee has found that it is false accounting for Governments to treat biomass as carbon neutral, as is the case in Scotland. 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 biomass meets sustainability standards will not be independently audited, making the standards meaningless.
- The UK Government recognizes that ROCs for Anaerobic Digestion could lead to expansion of food crops for biogas but the Scottish Government does not, and it is 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 only.

### **Action/Procedure**

When speaking with your MSP, it might be worth mentioning the changes to the legislation will require Parliament's agreement and approval; the necessary amending Order will probably be laid Parliament during summer 2012, and the changes taking effect from April 2013.

We are calling on MSPs to say **NO** to ROCs for biofuels, biomass, energy from waste & advanced conversion technologies. Please call on your MSP to:

- Lobby the government during consultation to express concerns over sustainability 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.