



Last-ditch climate option or wishful thinking?

Bioenergy with Carbon Capture and Storage

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Preface

ews about climate change is going from bad to worse: Last October, global warming breached the 1°C temperature rise barrier and has stayed above it for six months running. Carbon levels in the atmosphere are anything but safe and it is hardly surprising that the International Panel on Climate Change (IPCC) has been seriously looking at 'negative emissions', i.e. at ways of taking carbon already emitted out of the atmosphere again. But, as this report on Bioenergy with Carbon Capture and Storage (BECCS) shows, there is a dangerous trend to use the urgency of the climate crisis to justify unproven and potentially dangerous technological 'solutions'. One of the most hyped proposals for removing carbon from the atmosphere is BECCS, which would involve a massive global upscaling of bioenergy use, with CO₂ being captured from biomass combustion or biofuel production and then sequestered underground. According to the IPCC's latest report in 2014, most of their models and

be necessary for keeping global warming to within 2°C. Those who ran the models, however, simply input figures that assume that BECCS would indeed be carbon negative, without reviewing actual evidence about the technology – a circular argument.

This report summarises the key evidence that must be considered about BECCS. It looks at the overwhelmingly destructive impacts of existing large-scale bioenergy production and use and the implications of massively scaling it up, as would be required for a global BECCS programme. It examines the different technologies proposed for BECCS and shows them to be unproven, highly complex and thus failure-prone, and extremely costly. It also looks at evidence which shows carbon sequestration in geological reservoirs to be far less reliable than had been widely presumed. As the report concludes, BECCS is a dangerous diversion from the urgent and meaningful responses that the climate crisis requires.

scenarios 'proved' that BECCS will

What is BECCS?

BECCS is the proposed combination of bioenergy with carbon capture and storage (CCS), involving three steps:

- Bioenergy production: This can refer to a biofuel refinery or to a power plant burning biomass to generate electricity, or electricity plus heat, or a power station burning coal in combination with biomass, (in which case only the proportion of carbon captured from biomass would be classed as BECCS);
- Carbon capture from this refinery or power plant;
- Carbon storage in geological reservoirs: According to the International Panel on Climate Change (IPCC) [1] "storage" includes injecting captured CO₂ into geological reservoirs underground, as well as into partially depleted oil fields to force more oil from them (Enhanced Oil Recovery, or "EOR").

Research and development is also underway into using captured carbon to make various products, referred to as "carbon capture, utilization and storage" or "CCUS".

BECCS is commonly referred to as a 'negative emissions technology', based on the assumption that bioenergy is carbon neutral or very low carbon since all the carbon emitted from burning biomass will be taken up by new plant growth. It is suggested that capturing the CO₂ emitted from generating bioenergy and sequestering it will reduce the amount of CO₂ already in the atmosphere. This is a highly problematic concept because it

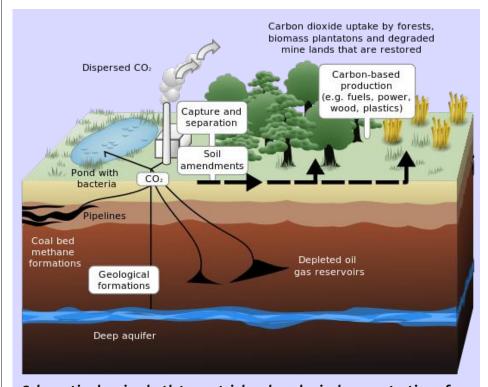
implies that bioenergy can be virtually carbon neutral even when used on a large scale, that BECCS technologies work and are scalable, and that it can indeed remove and sequester carbon from the atmosphere.

BECCS remains a theoretical concept since no operational BECCS facilities exist anywhere in the world. There are only a small number of ethanol refineries from which some CO₂ is being captured – but these are not described as "carbon negative" operations, since it is openly recognized that the amount of CO₂ captured is smaller than the CO₂ emitted from burning fossil fuels to operate these refineries.

To prove that BECCS actually works, it would be necessary to show that

1) it is possible to convert hundreds of millions of hectares of land to energy crops and use very large quantities of agricultural and forestry residues for bioenergy with zero or minimal direct and indirect greenhouse gas emissions from land use change and soil carbon losses, or from nitrogen fertiliser production and use; 2) that the technologies required for BECCS can operate reliably and offer energy balances which would make the process economically viable, (without the need for linking it to Enhanced Oil or Gas Recovery, i.e. increased fossil fuel burning); and 3) that CO₂ can be securely and safely stored over very long periods.

As we show below, none of these has so far proven true.



Schematic showing both terrestrial and geological sequestration of carbon dioxide emissions from a coal-fired plant. [i] LeJean Hardin and Jamie Payne

[i] Pond with bacteria refers to the idea of cultivating (most likely) genetically engineered algae or cyanobacteria in ponds for biofuel production, and feeding them on CO₂ rich smokestack gases.

A necessary technology? The IPCC and BECCS

he idea that BECCS can play a vital role in mitigating climate change has risen to prominence since the IPCC published their latest Assessment Report in 2014. According to their Synthesis Report, the great majority of "mitigation scenarios" which see global warming contained within 2°C involve emitting more CO₂ than is compatible with such a temperature limit in coming decades and then removing some of this CO₂ later this century through the use of BECCS as well as afforestation. The concept of emitting too much CO₂ and then removing some of it from the atmosphere is referred to as 'overshooting'.

On the one hand, the IPCC says that it is "highly confident" that we will need to use BECCS on a large scale from 2050 in order to keep global warming to 2°C. On the other hand, it acknowledges challenges and risks, and concedes that we don't know whether BECCS will actually become 'available' (i.e. viable), nor whether it can in fact be scaled up from being currently nonexistent, to fully effective and widely implemented. Elsewhere, the report acknowledges that BECCS has never actually been tested at scale. [2]

In short, we will need BECCS, yet it is a risky, unproven, currently nonexistent technology. Nobody knows if it will work. In fact a large and growing literature on the impacts of large scale bioenergy at the current relatively small scale, indicates that it cannot.

In 2007, the IPCC had called for new "Integrated Assessment Models" (IAMs), linked to "Representative

Concentration Pathways" to model emissions scenarios which would lead to different levels of global warming and represent different socioeconomic pathways and technology choices. [3] The 'IAM' teams were asked to "explore alternative technological, socioeconomic, and policy futures including both reference (without explicit climate policy intervention) and climate policy scenarios". [4] There would be "no overarching logic of consistency to the set of socioeconomic assumptions or storylines associated with the set of [pathways]". The assumptions used in the modelled scenarios should be 'technically sound'. But what does that actually mean? The standard was set extremely low: "Scientifically peerreviewed publication [even a single one, in any journal] is considered to be an implicit judgment of technical soundness".

The discrepancy between the high standard of evidence required by the IPCC in relation to evidence on climate science and climate change impacts on the one hand, and the low standard of evidence related to climate change mitigation options could hardly be greater. It stands in stark contrast even to their own approach to BECCS in 2007 when they concluded that there was only "limited understanding of the technology".

The IPCC uses the term "high confidence" to report the finding that CO_2 emissions have lowered the ocean's pH, or that the Greenland ice sheet has lost some of its mass. Yet those findings are based on a large number of studies in which a wealth of observational

An the context of the IPCC report, an Integrated Assessment Model (IAM) is a computer-aided model which combines modelling of physical climate change (i.e. forecasting temperature rises associated with different greenhouse gas concentrations) with modelling different policy and technology choices which would result in certain greenhouse gas concentrations and the likely range of warming associated with those. Modellers would thus assume that different technologies are 'high carbon', 'low carbon', 'zero carbon' and 'carbon negative' values and input the data accordingly.

data is analysed, i.e. they are derived from strong empirical evidence. The 'high confidence' about the 'need' for BECCS, on the other hand, is based entirely on computer modelling exercises, a handful of questionable assessments of biomass availability, and incorrect assumptions about the climate impacts of bioenergy processes. Meanwhile, a large volume of peerreviewed studies have been published which show that bioenergy is commonly associated with greater overall greenhouse gas emissions than equivalent amounts of energy produced from fossil fuels. [5] Instead of taking that body of literature into account, the IPCC appears to have simply lowered the standard of evidence.

As a result, IPCC conclusions about mitigation (upon which policies are based) rest precariously on the assumption that it is, or will be, possible to deliver negative emissions (i.e. to remove CO₂ from the atmosphere), mainly by using BECCS.

The fact that BECCS is indeed a dangerous distraction is immediately clear from the fact that "overshoot" is considered a manageable problem that can be later addressed. This further delays action, and provides fossil fuel

industries with rationale to continue business as usual.

BECCS after the Paris COP

hile not always referred to directly, BECCS is generally implicit in discussions where terms such as "net zero", "net negative" or "net neutral" emissions, are used due to the fact that the IPCC has singled it out as the main such strategy. It is also discussed in the context of climate geoengineering as a featured technology for "carbon dioxide removal" (CDR). In the Paris Agreement, which was the outcome of the 2015 UN Framework Convention on Climate Change Conference of Parties, BECCS is not explicitly mentioned. There are, however, relevant references to the concept of 'negative emissions'. For example, Article 4 of the Annex states that Parties "aim...to achieve a balance between anthropogenic emissions by sources and removals by sinks of greenhouse gases in the second half of this century...".

The Paris Agreement further (II.21) "invites the Intergovernmental Panel on Climate Change to provide a special report in 2018 on the impacts of global warming of 1.5°C above preindustrial levels and related global greenhouse gas emission pathways".

If this report presents BECCS as a viable carbon negative strategy, despite all the evidence to the contrary, it would create further impetus for companies trying to attract research and development funding as well as capital grants for BECCS projects. Even if the technologies might never become viable, governments including in the US have spent billions of dollars on ill-fated projects and technologies, including CCS projects (such as the failed Future Gen 2.0 and the failing Kemper County projects discussed below) and unsuccessful cellulosic and algal biofuel projects. [6]

Those funds should instead be directed to measures that are proven to genuinely reduce greenhouse gas emissions, such as energy efficiency, building and residential insulation and many others. The call for "negative emissions" has already spurred various initiatives to develop technologies, or at least to attract funding. The "Centre for Carbon Dioxide Removal", based at UC Berkeley, recently (April 2016) published a report "Philanthropy

Beyond Carbon Neutrality". It calls on philanthropists to make 'near term grants for carbon removal' available, conflating proven and beneficial approaches such as agroecology with unproven and dangerous ones such as BECCS. [7]

In "Vultures are Circling After Paris Agreement", Oliver Munnion critiques the report, stating "interspersed with pearls of wisdom copied from various twitter feeds (including: "Removing CO₂ from the atmosphere is and can be valuable"), a decent analysis of the various CDR proposals, their value to climate mitigation, and scalability, is decidedly lacking." [8]

IPCC claims about BECCS will continue to be used by the fossil fuel industry, arguing that its future 'availability' allows them to continue burning fossil fuels.

Removing carbon from the atmosphere to stabilise the climate: from BECCS to Carbon-Sucking Aliens

limate models suggest that we ■ need to stabilise CO₂ levels in the atmosphere at 450 ppm [ii] by the end of the century if we want to have more than a 50:50 chance of containing global warming to within 2°C of pre-industrial temperatures. [9] The conclusions of these models are supported by evidence on climate change in the Earth's past. CO₂ concentrations currently stand at 400 ppm and if methane and nitrous oxide are added to the equation, then we now have equivalent CO₂ levels of 430 ppm, with deadly consequences for many, especially in the global South. It is undeniably the case that greenhouse gas emissions must be rapidly phased out and that a substantial proportion of the CO₂ emitted since the industrial revolution must be somehow removed from the atmosphere.

This conclusion however is no more an argument for BECCS than it is an argument for the 'need' to invite carbon-sucking aliens to Planet Earth.



Does the concept of carbon-negative bioenergy make sense?

he fundamental idea behind BECCS and other 'negative emissions technologies' is to create a substantial new 'carbon sink', in addition to the existing ocean and terrestrial carbon sinks. The existing natural sinks are well proven across the Earth's history. Supporting them would mean putting an end to the destruction of ecosystems and degradation of soils, replacing industrial agriculture with agroecology and allowing degraded and destroyed forests and other ecosystems to regenerate. BECCS would do the opposite, by

incentivising very large scale bioenergy, creating huge new demand for biomass and thereby destroying existing natural 'sinks' in an attempt to artificially create a theoretical, new and unproven one.

Many studies addressing the greenhouse gas balances of bioenergy only look at the direct emissions from fossil fuel burning linked to bioenergy production, e.g. fossil fuels burned to power a biofuel refinery, to make pellets, or to transport biomass. Some also account for emissions from logging,

fertiliser use and land-use change for a particular consignment of bioenergy. Some studies, particularly about liquid biofuels, look at the emissions from certain indirect land use changes (for example, when bioenergy crops are grown on land formerly used to produce food or animal feed for livestock resulting in conversion elsewhere). The majority of indirect impacts however are virtually always ignored because they are difficult to quantify even though they may be substantial.

[ii] Note that this wording is not entirely accurate: Climate models and the IPCC speak of CO_2 equivalent (CO_2 e) levels of greenhouse gases, not just CO_2 . Because other greenhouse gas concentrations have also been increasing – especially methane and nitrous oxide – 450 ppm CO_2 levels are harder to achieve than 450 ppm CO_2 levels

Also largely ignored are the climate impacts of "lost sequestration", that is, the loss of future carbon sequestration when forests are cut, ecosystems are converted to monoculture plantations, and healthy soils are depleted.

For bioenergy to be considered carbon negative, it would be necessary to capture an amount of carbon equivalent to all the direct and indirect emissions, in addition to the future lost sequestration resulting from ecosystem degradation.

This is highly improbable, so we must ask: where do the optimistic figures for the 'negative emissions' potential from BECCS come from? They are based on a blanket assumption that bioenergy is inherently low carbon, provided that basic sustainability standards are in place (e.g. no conversion of forests to bioenergy crops). The large and fast growing volume of peerreviewed studies about the lifecycle emissions associated with different forms of bioenergy are ignored. [10]

The IPCC's 2014 Working Group 3 report on mitigation of climate change does acknowledge that there is potential for significant emissions, but refers to a 2011 report by the International Energy Agency (IEA) [11] for estimates of BECCS potential. The supposed potential is derived from two studies:

One is a preliminary assessment (not peer reviewed) from which IEA took their estimates for the global potential from crop and forestry residues. The authors do not describe their methodology in that publication. [12]

Although fossil fuel burning accounts for the bulk of global carbon emissions, researchers estimate that, historically, up to 200 billion tonnes of carbon have been lost through deforestation and other ecosystem degradation and destruction and soil depletion (see

http://www.grida.no/climate/ipcc_tar/wg1/pdf/tar-03.pdf).

Agroecology, ecosystem regeneration and ecosystem restoration could restore some of this carbon to soils and vegetation, though it could never sequester the carbon being emitted from fossil fuel burning today (and seeking to 'offset' fossil fuel emissions through agriculture and forests can never be justified). La Via Campesina and others are rightly highlighting the important contribution that peasant farming can make to combatting climate change. On the other hand, it is important be aware that terms such as 'ecosystem restoration' are routinely abused by industry interests to promote monoculture tree plantations at the expense of local communities, biodiversity, soil and water.

The second is a peer reviewed study from which the IEA took estimates for the maximum amount of bioenergy that could be sourced from dedicated energy crops. [13] The authors ran a model to calculate the maximum 'sustainable' biomass potential whilst accounting for land degradation, water scarcity and biodiversity protection. Their most conservative figures, used by the IEA, assumed that no forests and no nature reserves would be converted to bioenergy production, that energy crops would not be grown on severely degraded land, and they would all be rain-fed, not irrigated. Energy crops would, the authors assumed, only be grown on 'abandoned agricultural land' and natural grassland.

Yet, all indirect impacts are ignored, and remarkably, it is assumed that agricultural yields will increase by 12.5% by 2050 (even though IPCC's latest report concludes with 'high confidence' that "negative impacts of climate change on crop yields have been more common than positive impacts" so far.) Determining what land, globally, qualifies as "abandoned agricultural land", is highly problematic, as is the

assumed 'sustainability' of converting either abandoned agricultural land or natural grasslands to bioenergy crops.

Natural grasslands store large quantities of carbon, often in extensive root networks described as 'underground forests'.

Converting them to plantations thus fuels climate change as well as biodiversity loss. These facts are ignored by the authors of the studies on which the IPCC relied for calculating the 'BECCS potential'.

In summary, the IPCC, like virtually all who purport to show a significant potential for sustainable biomass, relied on very improbable and unfounded assumptions from a couple of sources.

Could large-scale, climate friendly and sustainable bioenergy ever be possible?

xisting policies to promote the expansion of bioenergy use, including in the EU and US, have quite clearly had 'undesired' consequences: they have led, both directly and indirectly, to increased deforestation and forest degradation and to widespread biodiversity destruction. These policies have also led to increased greenhouse gas emissions from land conversion, soil carbon losses and greater fertiliser use. Nitrogen fertilisers are the main source of the powerful greenhouse gas nitrous oxide (N_2O). Use of agricultural and forestry residues for bioenergy, instead of, or in addition to, dedicated energy crops is widely proposed. Most optimistic bioenergy scenarios, including ones for BECCS, rely on all of these sources combined. Yet there are serious problems with the concept that there are large quantities of forestry and agricultural residues available to burn without negative impacts.

Firstly, large and reliable quantities of 'residues' are generally only provided by industrial monocultures, such as palm oil and sugar cane. Secondly, removing too many residues depletes soil carbon and nutrients and leaves soils more vulnerable to erosion and drying. Thirdly, residues are widely used for other purposes already (animal feed or bedding and panel board manufacture, for example). The definition of 'residues' is wide open

to abuse. Some companies have found it easy to get away with referring to whole trees from clearcut natural forests as 'residues'. [14]

BECCS proponents tend to agree that there is a limit to the amount of bioenergy and thus BECCS that can be sustainable and low-carbon (or carbon negative in the case of BECCS). However, the assumed

'limit' is invariably many times greater than current global land and wood use for bioenergy, which is already associated with large-scale land-grabbing, loss of food and water sovereignty, forest and grassland destruction, soil and water depletion, and (in the case of biofuels) food price volatility, as well as the increased greenhouse gas emissions from land conversion, soil carbon loss and fertiliser use.



Communities in Maranhão, Brazil, have been fenced in by eucalyptus plantations for bioenergy. Ivonette Gonçalves



Biodiverse wetland forests are being cleared and turned into pellets in the southern US, due to UK biomass demand. Dogwood Alliance

Do BECCS technologies exist and are they scalable?

t is possible to capture CO₂ from power station exhaust or flue gases as well as from ethanol refining, to liquefy and transport captured CO₂, and to pump it underground. However, there are no operating pilot BECCS schemes, let alone commercial scale BECCS facilities, anywhere in the world. The only partial exceptions are a small number of projects involving carbon captured from conventional ethanol fermentation.

Ethanol fermentation results in an almost pure stream of CO₂, easier and cheaper to capture than the CO₂

found in much lower concentrations in power station flue gases. However, in each of these projects, less CO₂ is captured from ethanol fermentation than is emitted from fossil fuel burning to power the refinery, which means that they cannot possibly be 'carbon negative'. Furthermore, one of the projects depends on large subsidies (for geological sequestration), while others depend on sales of the CO₂ for use in "Enhanced Oil Recovery" (discussed below). Some ethanol refineries also capture CO₂ for sale in products such as carbonated beverages.

Some claim that BECCS could become technically and economically viable in the future with adequate investment and research. Such faith in a "technology learning curve" for BECCS appears extremely optimistic, given what we already know about the costs, energy demands and problematic technologies.

What technologies are proposed for BECCS?

echnologies for generating power from biomass and capturing CO₂ fall into the following categories:

- Capturing CO₂ from fermentation processes in conventional or advanced cellulosic ethanol refineries.
- Capturing CO₂ from cellulosic biofuel refineries, which turn solid biomass such as wood into a form of

biodiesel using gasification and Fischer-Tropsch synthesis.

- Post-combustion carbon capture from power plants burning biomass (with or without coal), i.e. capturing CO₂ from the flue gases before they are emitted to the atmosphere.
- Pre-combustion carbon capture from biomass or biomass with coal power plants that use "Integrated Gasification Combined Cycle" (IGCC)

processes: An IGCC plant involves heating solid fuel (e.g. wood) so that it turns into a gas, and then burning the gas to power both a gas and a steam turbine. The CO₂ would be captured from the gas before it is burned.

Capturing CO₂ from a facility using oxyfuel combustion to burn biomass (with or without coal): Oxyfuel combustion involves burning solid fuel in nearly pure oxygen rather



Skyline of ADM plant in Decatur, Illinois. Dan

than air. This results in a gas that consists mainly of CO_2 and water vapour, making it easier to capture the concentrated CO_2 .

When biomass is burned with coal, only the fraction proportional to the amount of biomass being burned would be considered "BECCS". The only technology that has so far been tested with biomass at all is CO₂ capture from fermentation (a). We therefore have to rely on information from a few coal CCS facilities as an indication of how BECCS would operate if solid biomass, or wood, were to be used.

CO₂ capture from biofuel refining

Only one (corn) ethanol refinery, owned by Archer Daniels Midland in Decatur, Illinois, aims to actually sequester the CO₂ it produces. With most of the \$292 million cost for the operation paid for by the U.S. Department of Energy, the facility has succeeded in capturing and pumping about 1 million tonnes of CO₂ into the nearby Mount Simon Sandstone formation, with a second phase demonstration project still apparently planned. The project has never been defined as "carbon negative" because, like most ethanol refineries around the world, fossil fuels are used to power the facility, which results in more emissions than could ever be captured from fermentation.

Capturing CO₂ from cellulosic ethanol fermentation would be similar in theory. However, efficient and therefore commercial production of cellulosic fuels remains highly elusive, in spite of decades of research and many hundreds of millions having been spent on research and development.

In theory, CO2 capture from biofuel production involving gasification and Fischer-Tropsch synthesis could be possible. The process results in a gas that consists mainly of water vapour, methane, hydrogen and carbon monoxide (CO). Once cleaned of impurities, this is called "syngas". During Fischer Tropsch synthesis, the carbon monoxide reacts with water to form more hydrogen as well as carbon dioxide. The CO₂ can then be captured, while the other molecules undergo more reactions in order to produce transport fuels. However, gasification and Fischer-Tropsch synthesis are highly complex and failure-prone technologies. Despite significant subsidies and investments, nobody has succeeded in operating a commercially viable biofuel refinery of this type to date.

Biomass combustion for electricity (or electricity and heat)

Post-combustion carbon capture involves capturing CO₂ from exhaust flue gases. The concentration of CO₂ in flue gases is very low, trace impurities reduce the effectiveness of the carbon capture equipment, and capturing (and compressing CO₂

for transport via pipeline) uses significant amounts of energy.

What can we learn from coal CCS experience? Canada's SaskPower Boundary Dam project, the first commercial scale post combustion CCS facility, after receiving C\$240 million in government grants, was finally opened amid great fanfare in October 2014. Claims were made that the facility was operating splendidly, "exceeding expectations", and it won awards. However, it subsequently became clear that the facility has in fact never performed well at all, managing to capture only a small fraction of the CO₂ anticipated, and resulting in a much higher energy penalty than previously claimed. SaskPower has been forced to pay millions of dollars in penalties to Cenovus, the company they are contracted by to supply CO₂ for Enhanced Oil Recovery. [15]

Carbon capture at Boundary Dam was initially supposed to involve a 25% energy penalty. Recently, it has been reported that up to 31% of the energy the facility generates is used to power carbon capture and compression. [16] The energy penalty would be even higher for



SaskPower's Boundary Dam power station. Magnus Manske



Kemper County coal IGCC power station with carbon capture, currently under construction. XTUV0010

biomass plants since they tend to be less efficient than coal power stations. A unit of electricity generated in a dedicated biomass power plant for example, results in up to 50% more CO₂ emissions than if generated from burning coal. [17] Since more CO₂ is released per unit of energy generated, even more energy is needed to capture the resulting CO₂, hence an even greater energy penalty can be expected for facilities burning biomass.

A report from the Global CCS Institute [18] predicts that capturing CO_2 from a 76 MW biomass power station, which would otherwise have a conversion efficiency of 36%, would reduce that power station's electricity output to just 49 MW, and would reduce efficiency to just 23%.

Oxyfuel combustion involves burning fuel with nearly pure oxygen, which results in a flue gas in which CO₂ is highly concentrated and thus easier and cheaper to capture. However, producing almost pure oxygen is energy intensive.

Some small demonstration coal oxyfuel facilities exist, but, as for most combustion technologies, biomass results in further inefficiencies. The notorious "FutureGen 2" project in the US would have involved oxyfuel CCS. Over \$200 million in government subsidies were provided along with a pledge to invest over \$1 billion, but due to slow progress, cost overruns and lack of interest from private investors, the project was abandoned.

Integrated Gasification Combined Cycle (IGCC) facilities would at least theoretically be among the cleaner and more efficient technologies. IGCC involves gasifying solid fuel, cleaning the gas and then burning the syngas to power both a gas and a steam turbine. However, the process is hugely complex, involving multiple elaborate stages, and reliable operation has been elusive. Attempts to resolve technical problems have made IGCC plants even more complex, expensive and failure-prone.

A few coal IGCC facilities have operated without CCS, but the addition of CCS only further complicates operations. This is because (just as with the Fischer-Tropsch technology described above) it involves reacting the carbon monoxide with water to form carbon dioxide and hydrogen and then capturing the carbon dioxide. This leaves almost pure hydrogen to be burned, something turbines have not been developed for. One (non-CCS) facility in Spain required 6,000 modifications after construction. Another non-CCS IGCC plant, the Duke Energy facility in Indiana (US), cost \$3.5 billion to construct, and 20 months after it was commissioned, it had never operated at even 50% of its capacity.

That did not stop the US government from awarding a \$270 million grant plus \$412 million in tax credits to the Southern Company for construction of a 582 MW coal IGCC facility with CCS (with the CO₂ to be sold for Enhanced Oil Recovery). The Kemper Mississippi facility started construction in 2010 with costs estimated at \$1.8 billion, but had ballooned to over \$6.4 billion by November of 2015. At present, the facility is simply burning natural gas, without CO₂ capture.

An IGCC facility with CO₂ capture running on biomass, rather than coal, would therefore be technologically even less certain, less efficient and more costly.

Can we trust that sequestered CO₂ will stay put?

aptured CO₂ may be injected into underground geological formations such as old oil and gas reservoirs or deep saline aquifers. The CO₂ is trapped in the pore spaces of sedimentary rocks, and held in place by dense "caprocks". CO₂ can be stored as a compressed gas, liquid, or in a high-pressure liquid-like form called "supercritical CO₂", depending on conditions. Mechanisms for trapping CO₂ include: [19]

1) Hydrodynamic trapping:

This occurs when CO_2 is trapped under a low-permeability caprock (i.e. underneath a layer of hard, resistant rock). Any storage site must be suitable for hydrodynamic trapping, as it prevents CO_2 escaping from the reservoir during the time required for other, slower trapping mechanisms to take effect. Such traps are mostly found in reservoirs that have held oil and gas in the past, or in saline aquifers that form parts of sedimentary basins, such as the Utsira formation in the North Sea.

2) Residual or capillary trapping: When CO₂ is injected into a brine (i.e. salt water filled reservoir), some remains trapped in an immobile phase, disconnected from the rest, which migrates upward.

3) Solubility trapping: This occurs when CO₂ dissolves into water contained within the resevoir, until an equilibrium is reached. It can take thousands of years.

4) Mineral trapping:

Mineral trapping occurs when CO₂ is incorporated via chemical reactions, into mineral and organic matter within the formation. This is a very slow process that occurs over geological time scales. [20]

How could CO, leak?

Of greatest concern is leakage from old abandoned oil and gas wells, of which there are around 3 million in the US alone [21] Of particular concern are onshore wells that were not plugged, or which have cement plugs that are cracked. In parts of North America there are very high densities of oil production wells left unplugged following bankruptcies due to the 1986 oil crash. Unplugged wells penetrate many of the deeper formations currently used or considered for CCS. [22]

However, even if wells have been plugged with cement, the CO₂ that is injected into reservoirs dissolves in trapped salty seawater and turns it highly acidic. This acid water can cause the cement to corrode, crack and fail. Several hundred producing and old or abandoned wells could already be affected by acidified salt water. [23]

Further studies which have been conducted in other intensively drilled areas show that large numbers of existing oil and gas wells can lead to complex leakage patterns, across multiple geological formations. [24] CO₂ gas can migrate rapidly, over long distances and over long periods of time. [25]

The chemistry of geological sequestration and the trapping mechanisms involved, are in fact poorly understood. For example, it appears increasingly likely that only a small fraction of injected CO₂ is converted to stable solid minerals, whereas previously it had been assumed that far greater proportions would be. [26, 27]

Estimates of the overall capacity for CO₂ storage in different regions is also poorly understood and hotly debated. [28] Assessing the truth is challenging because studies that question assumptions about the viability of CCS are rapidly met with a barrage of responses, rebuttals and counter arguments, especially from industry proponents. [29]

Has geological sequestration of CO₂ been successful?

The three largest CO₂ storage projects to date are: 1) Cenovus Energy's Weyburn Enhanced Oil Recovery site in Canada, 2) BP and Statoil's Sleipner project in the North Sea, and 3) The In Salah gas production site in Algeria, operated by BP, Statoil and Sonatrach. All three have been heralded as examples of successful carbon sequestration, but are in fact surrounded by controversy.

Did CO2 leak at Weyburn?

Cenovus Energy began injecting CO₂ purchased from the only coal-to-liquids gasification plant in the U.S and delivering it to the Weyburn oil field in southeast Saskatchewan, Canada, in 2000. The company states that 60% of the oilfield is undergoing CO₂ flooding (a method of Enhanced Oil Recovery discussed below). [30]

In 2010, Cameron and Jane Kerr, farmers living near Weyburn [31] reported some unexplained phenomena on their farm, including animals dying on their land, and what appeared to be CO₂ bubbling up from water bodies on their land, whilst an oily film suggested hydrocarbon leakage. The Kerrs

hired Petro-Find Geochem Ltd to undertake studies, which concluded that CO₂ was in fact leaking from the injection site, [32] casting serious doubts on the success and safety of CO₂ injection. Cenovus in turn commissioned Trium Environmental and Chemistry Matters to carry out another study, which found no CO₂ leakage.

Beginning in 2000, a consortium of companies and organisations, under the management of the Petroleum Technology Research Centre (PTRC) had been contracted to do monitoring at the Weyburn site on behalf of Cenovus, with funding from Canadian regional and national governments and oil and gas industries. [33] The monitoring ended in 2012, and included just five soil gas surveys conducted between 2001-2005, 2 miles north of the Kerr property, comprising only about 5% of the total area of the Weyburn and Midale fields. [34] They issued two reports proclaiming that no leakage had occurred.

The International Performance
Assessment Centre for the geologic storage of Carbon Dioxide, (IPAC-CO₂), was established in 2008 by
Royal Dutch Shell, the Government of Saskatchewan, and the University of Regina. [35] They also did a study and also concluded no leakage had occurred. [36] Yet, in 2013 IPAC-CO₂ closed down amid allegations of conflicts of interest and misspending of public funds [37] and were subsequently investigated for fraud. [38]

The Sleipner CCS Project

Statoil, ExxonMobil and Total have been injecting up to 1 million tonnes of $\rm CO_2$ a year, captured from a natural gas processing facility, into a sub-seabed saline aquifer called the Utsira formation, since 1996. The

site is just above an oil field called Sleipner East, after which the project is named. By early 2013, more than 14 million tonnes of CO₂ had been injected. [39] CCS proponents point to Sleipner as proof that CO₂ can be stored safely and permanently, and claim that the Utsira formation is large enough to hold all of Europe's power plant emissions for many years to come.

However, a series of problems have occurred at injection sites along the Utisira formation: In 2004, oily water was observed on the sea surface near the ExxonMobil operated Ringhorne site. In 2007 unexplained activity in the seabed that involved cracking and/or other damage to the formation, was reported, probably related to the injections at the StatoilHydro operated Visund Field. [40] In 2008, an oil leak occurred from the StatoilHydrooperated project in the Tordis field, where contaminated process water was being re-injected.

At Sleipner, injected CO₂ was expected to rise gradually through the layers of the formation. However, seismic imaging showed that the plume ascended 200m vertically through eight shale barriers in less than three years. [41] Previous monitoring studies revealed a large discrepancy between the amount of CO₂ injected and what was subsequently detected in seismic surveys, potentially indicating leakage. [42] An extensive, and previously unexplored fracture in the sea bed rock - the "Hugin Fracture" was discovered 25 km north of Sleipner CO₂ storage site. [42, 44] That discovery was apparently buried following swift and negative rebuttal. [45] A 2014 study concluded that overall, the fate and migration of injected CO2 is still poorly understood at Sleipner, some 10 years into the injection programme. [46] Meanwhile, questions have also been raised over just how much CO₂ can realistically be stored within the Utsira formation. [47]

CO₂ sequestration at In-Salah

The In Salah CO₂ storage project at the gas-producing Krechba field in Algeria involved the injection of nearly 4 million tonnes of CO₂ into three wells between 2004 and 2011. A seismicity study at the site indicated that CO2 injection had activated a deep fracture zone (i.e. an area of naturally-occurring fractures that had previously not showed signs of movement) near to one of the injection sites that appeared to open during injection and subsequently close up after injection was halted. [48] Another study reported that the fractures had extended into the lower caprock, but that "no leakage had occurred." [49] Leakage did occur when CO₂ migrated to a nearby old well and leaked through the valve. [50] CO₂ injection was stopped until the well was fully decommissioned. [51]

A final issue regarding CO_2 storage is the monitoring of storage sites. Fundamentally, CO_2 must be stored underground on geological timescales – i.e. thousands of years. But monitoring of storage sites doesn't necessarily continue after CO_2 injection has stopped.

In sum, the answer to the question "will CO₂ injected into storage sites remain permanently sequestered" seems likely to be "No", at least in many or most cases. However it is difficult to assess results to date because of a) lack of understanding, and b) the role industry plays in challenging results that are unfavorable to their interests.

Making money from captured carbon: Enhanced Oil Recovery (EOR)

hen a new oil field is first drilled, underground pressure in the oil reservoir forces oil to the surface, called 'primary recovery'. Secondary recovery involves pumping (which takes energy) and injection of water to create the necessary pressure. When about 35-45% of the reservoir is depleted, further extraction requires the use of EOR. EOR currently allows a further 5-15% of oil in a reservoir to the exploited, which is equivalent to all 'primary recovery'. It is therefore highly significant for overall oil production. EOR methods include energy intensive injection of steam, in-situ burning of some oil in the reservoir to heat the surrounding oil, injection of detergents, microbial treatments (not widely used), and gas injections, including the use of natural gas, nitrogen and pure CO₂. In the latter,

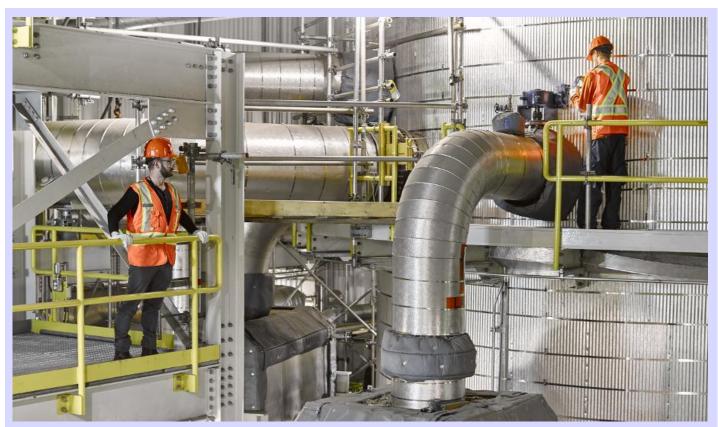
CO₂ injection is used in about 60% of EOR projects in the US. [52] Hereafter we refer to EOR using CO₂ flooding.

In 2014 [53] total onshore oil production in the US was around 9 million barrels per day, 3.4% of which was extracted utilising EOR. Industry claims that vastly more oil could be accessed with adequate and cheap supplies of CO₂. [54] The US Department of Energy in 2014 projected that potential oil resources recoverable with EOR could be up to three times the current proven reserves in the US.

CO₂ flooding for EOR has been used since 1972, long before Carbon Capture and Storage was first proposed. With the advent of CCS, commercial sale and use of captured CO₂ for EOR has become widely

promoted as the main solution to offsetting the high costs of carbon capture, making it more economically viable, especially in North America. In 2014, there were 136 CO₂ EOR projects in the US, producing some 300,000 barrels of oil per day using around 175,000 tonnes of CO₂. 80% of that CO₂ was sourced from natural reserves, while the remaining 20% was sourced from industrial carbon capture. [55]

The high cost of acquiring, transporting and injecting CO_2 has restricted use of EOR in many areas. Capturing 'anthropogenic' CO_2 would allow for CO_2 to be acquired from more locations at lower costs, thanks to government financial support for CCS. The cheapest supplies of anthropogenic CO_2 can be obtained from capturing almost pure CO_2 streams, including from



Carbon capture infrastructure at the Boundary Dam. SaskPower

ethanol refineries. Carbon capture from power stations provides the largest potential source of CO2 but, as discussed above, is highly expensive and fraught with technical problems. Two important caveats need to be made regarding the oil industry's interest in purchasing CO₂ for use in EOR: 1) oil companies show little inclination to invest much in CO₂ capture themselves, and 2) EOR projects are amongst many other oil industry investments that are being cut as prices have recently fallen dramatically. [56]

How much CO₂ stays underground?

In order for EOR to work, a significant proportion of the injected CO2 has to mix with the oil, which lowers its viscosity, that is, causing the oil to flow more easily. Between one half and two thirds of the CO₂ injected is subsequently brought back out of the well to the surface, mixed with the oil. [57] That CO₂ is then separated back out, an energy intensive process, and could be re-injected. [58] In theory, all of it could be re-injected to remain in the oil reservoir. In reality however, CO₂ can escape via leakage during transport (usually by pipeline), during maintenance related venting, through fugitive emissions from CO₂ returned through production wells, as well as potentially leaking from the wells themselves. Oil industry estimates indicate that about 30% of the CO₂ piped to an EOR site will be directly emitted back into the atmosphere. [59]

A study looking at the life-cycle inventory of EOR emissions [60] concludes that significant net emissions occur. Add to that emissions from oil produced as a result of CO₂ injection: Typical

recovery from CO_2 injection ranges between 1.1 and 5 barrels of oil for every tonne of CO_2 injected.

Another look at the Boundary Dam CCS project: How CCS with EOR increases emissions

SaskPower is contracted to supply Cenovus Energy with CO₂ for use in EOR at the Weyburn oil field from their Boundary Dam coal power plant. The company claims that the power station is:

"...capable of reducing greenhouse gas emissions by one million tonnes of carbon dioxide (CO₂) each year, the equivalent of taking more than 250,000 cars off Saskatchewan roads annually."

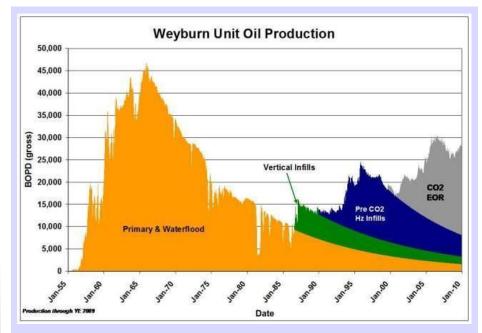
As pointed out above, the facility has been capturing far less carbon than originally intended. But would it have achieved such emissions reductions if it had operated as intended? The answer is no.

SaskPower's claim rests entirely on the assumption that all of the captured CO₂ stays underground once injected, and that the

emissions caused by the extra oil that is pumped out by Cenovus, are not the responsibility of the company or its power station. When all emission sources are considered, it becomes clear that the Boundary Dam facility in no way decreases emissions, but rather increases them substantially. We conclude some 0.7 million tonnes of CO₂ may remain underground after injection, but 1.5 million tonnes of CO₂ will have been created during the overall process.

SaskPower is therefore misrepresenting the reality of the Boundary Dam's carbon impacts. Sadly, they can get away with such claims partly because the IPCC has classed EOR as a form of Carbon Storage, including it in climate mitigation scenarios despite the fact that, when considered on a life-cycle basis, it can increase rather than reduce carbon emissions.

The rhetoric surrounding carbon capture as a "solution to climate change" is essentially a PR strategy, providing false assurances that fossil fuels can continue to be used with impunity, while misrepresenting the true risks.



Weyburn is one of the largest oil fields in Canada. This graph shows how oil recovery has been aided by ${\rm CO_2}$ injection. Cenovus Energy Inc.

Turning captured carbon into 'useful products'

undreds of millions of dollars and euros in public funds have been spent on developing 'useful products' made from captured CO₂. The German government made €100 million available from 2010 to 2015 for research and development into the material use of CO₂. [61] The US Department of Energy has made some of the \$6 billion (€5.57 billion) funding for CCS Research and Development available for uses of captured CO₂, [62] and other governments, especially in Canada and Australia, have made further funds available.

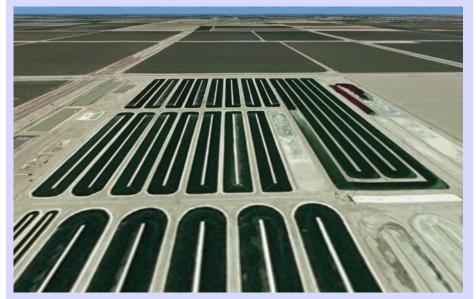
Most of those uses cannot possibly be described as 'sequestration'. For example, significant funds are going into Research and Development to grow algae and bacteria fed with CO_2 rich exhaust gases so that they convert the CO_2 into biofuels. Of course the CO_2 would then be released into the atmosphere again as soon as the biofuels are burned – but that does not prevent the Algae Biomass Organization in the US from describing those concepts as BECCS (or "BECCSU", with the 'U' referring to 'use'). [63]

Other companies are looking to use captured CO₂ for different short-term products such as bioplastics, bleach [64] or even fracking fluids. [65] Some are even looking to use CO₂ in production of nappies [66] or foam mattresses.

Some projects involve trying to incorporate CO₂ into more durable products – especially cement. Cement production worldwide is responsible for around 2 billion tonnes of CO₂ emissions a year, both from the fuels burned to provide energy and as a result of the basic chemical process involved (calcination of limestone). [67] Government-funded research and development has been looking at incorporating captured CO₂. However the only commercially viable cement product incorporating injected CO2 is made by Carbon Cure, who merely claim that this process reduces the overall CO₂ emissions from their cement production by 20% - a long way from making it 'carbon negative'. [68] Carbon Cure have failed to respond to a Biofuelwatch query about their life-cycle calculations, hence even their "20% less CO₂" claims cannot be verified.

Several of the Research and Development projects on 'carbon capture and use' involve synthetic biology. For example, companies such as LanzaTech and Joule are genetically engineering algae and cyanobacteria to convert CO₂ directly into fuels.

Synthetic biology is extreme genetic engineering. There is no universal definition but the term is used to describe novel genetic engineering techniques (including trying to build new genes and even organisms from scratch), as well as 'metabolic engineering', i.e. making substantial changes to an organism's metabolism. For more details, see **synbiowatch.org**.



Algal ponds such as this one in the USA, use algae to try to produce biofuels. Pacific Northwest National Laboratory

Technology: The missing piece in the debate about BECCS

aving faith in BECCS as a technology seems at best highly naïve, given that there has never been a successful CCS power station and that there is no evidence that anyone has ever managed to generate any energy at all from advanced biofuel production, let alone tried to capture carbon from it. Despite this, whilst they may aknowledge potential concerns with land use change and the sustainability of biomass, virtually all peer-reviewed studies on BECCS

blithely assume that technological obstacles can be easily overcome (see for example [69]). A peer-reviewed commentary on BECCS, published in Nature Climate Change in 2014, identified four uncertainties that would need to be resolved, [70] but never questions the viability of what, after all, is acknowledged to be an 'untested technology'. As for cost, the authors simply point to studies, including the 2014 IPCC report, which state that climate change mitigation would be more

costly without 'negative emissions'. Judging by the costs of and problems associated with attempts to capture CO₂ from coal power plants, and the added cost of biomass (including the even greater energy need for capturing CO₂ from biomass compared to coal plants), it is difficult to imagine a more expensive way of trying to mitigate climate change.

Concluding reflections: The pseudo-science around BECCS

hile we were working on this report, Indonesia's forests and peatlands were in flames in what an independent researcher has called "the biggest environmental crime of the 21st century" [71] and what the Indonesian meteorological institute has described as "a crime against humanity of extraordinary proportions". [72] Between July and October 2015, around 100,000 fires had been recorded across Indonesian Borneo, Sumatra and on West Papua, more than half of them on peat. [73] Over two million hectares have been reduced to ashes, [74] including in national parks and in forests which had been the last refuges for endangered species such as orangutans.

Indonesia's peatlands hold billions of tonnes of carbon and according to an initial estimate, over 1.75 billion tonnes of CO₂ [iii] will have been emitted by the end of 2015 as a result of the peat fires that year. [75] This is far more than the annual CO₂ emissions of Germany or Japan. Smoke inhalation was affecting 48

million people and at least 500,000 cases of acute respiratory infection have been reported on just two of the three affected islands. Most of the fires had been extinguished by rains in late December 2015, but by March/April 2016, fires were once more burning out of control in Sumatra and Borneo. [76]

Satellite images from the early weeks showed that most of the fires were concentrated in the region with the highest palm oil concessions in Indonesia. [77] Oil palm and pulpwood plantation

companies have for decades been digging drainage canals across peatlands, drying the peat up and thus making it easily flammable.

Across Asia, high palm oil prices – and the expectation of continuing growth in demand – is leading plantation companies to clear ever more forests and peatlands. In recent years, Indonesia's rate of deforestation has shot up to become the world's highest, [78] and a 2013 mapping analysis by Greenpeace identified palm oil as the single biggest driver. [79]



Peat and forest fire in Kalimantan, Indonesia, December 2015. NASA



Forest destruction for palm oil plantations in West Kalimantan, Indonesia. Rainforest Action Network

EU imports of palm oil for biofuels from Southeast Asia rose 365% between 2006 and 2012, accounting for 80% of the overall increase in EU palm oil imports for all purposes. [80] EU biofuel policies, which were legitimised by 'sustainable biomass potential' studies, clearly bear some of the responsibility for the catastrophe in Indonesia.

EU standards, at least in theory, prevent biofuels sourced from plantations and linked to recent deforestation from counting towards renewable energy targets. But they have done nothing to limit the incentives for forest destruction created by biofuel expansion, through higher palm oil prices. Indonesia's fires thus illustrate the deep flaws in the idea that, with the help of sustainability standards, one can increase global bioenergy use

without triggering major destruction of ecosystems and the carbon emissions that accompany it. This is the same wrong idea that underlies the concept of BECCS, and has been the rationale for bioenergy policies in the EU, North America and elsewhere.

There is also no evidence that EU biofuels standards have even been enforced, which would in theory prohibit biofuels sourced through new deforestation or peat clearance from being subsidised or counted towards renewable energy targets. Even if they were enforced, companies could easily sell palm oil for biofuel production from older plantations, linked to past, rather than new deforestation, and in turn burn more peat forests to establish new plantations to serve the existing markets. Nobody can say

what proportion of the fires were due to biofuels, but even a minor share of the overall responsibility for the fires could translate into carbon emissions many times higher than what the EU officially set out to 'save' through biofuel use.

Indonesia's fires have by no means been the only disastrous impact of EU biofuel and wider bioenergy policies. [81] Leading researches and institutions have also failed to question the basis for these policies – the credibility of academic claims made about the potential for largescale 'sustainable biomass' – despite the clear evidence of the real-world impacts of industrial bioenergy. The IPCC has described a possible future increase in 'modern bioenergy' by 550% from current figures as their 'limited bioenergy' scenario. [82] In the same report, they included

scenarios in which BECCS could remove up to 5.45 billion tonnes of carbon (10 billion tonnes of CO₂) from the atmosphere every year. This would be the equivalent of 83% of both the existing global land and ocean carbon sinks combined.

The research highlighted in this report on bioenergy and BECCS raises serious questions about the prevalent discourse on climate change mitigation, not just amongst policy makers, but also amongst leading scientific institutions, including the IPCC. [iv] Why is the underlying premise of a large potential for sustainable, low or zero carbon bioenergy not being questioned? Why do so many studies about the potential for 'sustainable bioenergy' (including for the purpose of BECCS) rely on sustainability standards as a supposedly credible key tool? Why could we not find a single study that tests the hypothesis that sustainability standards can be effective against real-world evidence? Why does study after study state as "fact" that BECCS is a cost-effective way of mitigating climate change, [83] even though none of the proposed BECCS technologies (except for a small amount of CO_2 capture from ethanol refining for use in EOR) have ever been implemented on any scale? [v]

Policy makers are being misled about the 'potential' for using bioenergy to scrub CO₂ from the atmosphere. Thus, they are also being misled to believe that we can continue to burn fossil fuels, continue to achieve economic growth, and yet still avoid the worst impacts of climate change.

The IPCC, the IEA and various academic institutes share some of

the responsibility for this. The IPCC's conclusion on BECCS and climate change mitigation are particularly disappointing in this context, given the key role that the IPCC has played in defending the scientific consensus on climate change. [84]

Claims about BECCS – like other 'negative emissions technologies' – are based on pseudo-science, coupled with corporate lobbying. Even if it is unlikely that BECCS will ever become a reality, the claims made about it are highly dangerous: we cannot afford false assurances about ways of removing carbon from the atmosphere, and we cannot afford false assurances about the feasibility of very large-scale industrial bioenergy either.

This report is a summarised version of Biofuelwatch's longer report, with the same title. The full report is available to download for free here:

http://www.biofuelwatch.org.uk/2015/beccs-report/.

[iv] When discussing the IPCC in this context, it is important to be aware that there are three working groups: Working Group 1, which looks at the science of climate change is dominated, quite appropriately, by climate scientists. Working Group 3, which publishes the reports about climate change mitigation and adaptation, on the other hand, is dominated by economists, environmental managers and engineers. All references to the IPCC in this report refer to Working Group 3.

[v] As discussed previously, ADM's capture of CO_2 from ethanol fermentation at their Decatur plant has been referred to as BECCS by BECCS proponents, however we do not class it this way because ADM themselves do not consider the refinery to be 'carbon negative' since the fossil-fuel carbon emissions associated with their refinery exceed the amount of CO_2 captured.

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it's too expensive and untested. But, as a Shell Climate Advisor The chances of BECCS being implemented are next to none locus on the real issues: keeping fossil fuels in the ground and end of the century." BECCS hype must be stopped in order to said: "BECCS can help us to keep burning fossil fuels until the <u>BECCS AND "CARBON NEGATIVE" HYPE IS A DANGEROUS</u> <u>BIOENERGY WITH CARBON CAPTURE AND STORAGE (BECCS) IS BEING HYPED AS A CLIMATE SAVIOUR 4 BUT WHAT WIL</u> inding equitable and just solutions to global climate change. FOREST or wood and Excessive demand prest destruction. A nderlying causes of gricultural products CONVERSION TO onverted to ernaps as much ould need to be uge areas of land sed to grow food onoculture tree ergy crops intations and as is current BECCS/"NEGATIVE capture some of the stations would burn BECCS power nobody has shown Building such powe carbon they emit. wood, energy crops Some of this carbor can leak out SEQUESTRATIO "sequestered" CO underground, but would be stored here's growing 8 CO2 CO2 CO2 CO2 CO2 CO2 0 ENHANCED OIL emitted by the extra oil fields, to squeeze carbon would be More likely is that with the oil, and ever hem. Significant vould come back or amounts of CO₂ en more out of bumped into ageing carbon, as their emissions would continue emittino dirty, polluting **BUSINESS AS** industries could n the meantime 'offset" by the MEAN If BECCS worked it doesn't, hype CLIMATE CHAOS vould be a recipe for CONCLUSION? ourning and thus bout it legitimises saster - but even