

Dear Sir/Madam,

I am writing on behalf of Biofuelwatch with regards Forth Energy's second consultation related to their application for planning consent for a biomass power station at Grangemouth Port. According to letters received by local residents, the second consultation period will end today. We are very concerned about the status of what Forth Energy have published as a second consultation. We note that the Energy Consents Unit website does not acknowledge the existence of the consultation and, furthermore, the dates given on Forth Energy's website and on the letters sent to residents are not the same. Moreover, while Forth Energy state that they have obtained new evidence in the form of three new consultants reports, that evidence, i.e. those reports have not been published and cannot therefore be scrutinised by the public. We believe that the new claims put forward by Forth Energy, contained in an Addendum to their consent application (<http://www.forthenergy.co.uk/pdf/Grangemouth-Addendum-2011-05-19.pdf>) merit a proper and transparent second consultation, one that is advertised by the Energy Consents Unit and includes publication of the three reports to which the Addendum refers.

I would like to confirm that the grounds for our objection submitted during the initial consultation period remain. Additionally, we would like to submit the following comments about the claims contained in the Addendum:

- ⤴ As mentioned above, the new consultant reports about air quality, carbon emissions and the heat supply potential have not been published and it is therefore impossible to verify or comment on the new claims arising from them.
- ⤴ The air quality chapter of the Addendum claims that a new assessment by SKM Enviros has made predictions by gathering all available data on existing air quality in the Grangemouth area and comparing them with UK 'safe levels' (presumably meaning legal limits), adding a figure of maximum emissions permitted, presumably under the EU's Large Combustion Plant Directive and running an air dispersion model. Forth Energy claims that this shows that legal SO₂ limits would not be approached even with the additional emissions – however figures published by Falkirk Council show repeated, regular and increasing breaches of the legal limit for 15-minute SO₂ levels at different sites in Grangemouth. This is why Grangemouth has been declared an Air Quality Management Area. The claims made by Forth Energy that legal SO₂ limits would not be approached cannot therefore be true. Indeed, this claim is contradicted by a second one further down in the Addendum report: “In particular for sulphur dioxide, where emissions from local industry have led to exceedances of safe levels in part years, our assessment demonstrates that the plant would not add to these exceedances.” Yet it is clear that there will be additional SO₂ emissions from the power station and no information as to why those should not add to exceedances has been provided. This suggests that all of the air quality claims in the document require close scrutiny, which is impossible without seeing the actual Air Quality report and all the data in it.
- ⤴ The Addendum uses as the 'worst case scenario' maximum emissions permitted under the Large Combustion Plant Directive. It does not suggest that expected emissions from a biomass power stations of the size and with the technology and stack height proposed have been calculated and modelled (or, if they have, that information has not informed the Addendum report). The Addendum merely claims that “Measurements on existing plants confirm that these will, in actual fact, be no more than 70% of the permitted rate.” Yet there are no biomass plants of a comparable size in the UK and we have been unable to find any examples of biomass power stations of a comparable size and with a similar design. This means that the fundamental question whether the proposal is likely to breach aspects of air

quality legislation has not been addressed.

- ⤴ Forth Energy refer to a new, unpublished, report by the Scottish Institute of Sustainable Technology according to which their biomass (for Grangemouth) will result in a maximum carbon debt of just 11 years and save 11 million tonnes of CO₂ over 20 years. In a response to a letter and planning objection by US organisations, Forth Energy made it clear that they did not know from where the biomass would be imported and that the regions listed in their Sustainability Statement only served as examples for the purpose of their carbon assessment (www.forthenergy.co.uk/pdf/FOE%20-%20US%20-%20FE%20Response%20-%200060411.pdf). We cannot see how a genuine carbon assessment can be conducted without knowing where and how the biomass will be sourced. Furthermore, a claim of an 11 year carbon debt conflicts with evidence contained in various studies, including a report by the Manomet Center for Conservation Sciences ([http://www.manomet.org/sites/manomet.org/files/Manomet Biomass Report Full LoRez.pdf](http://www.manomet.org/sites/manomet.org/files/Manomet_Biomass_Report_Full_LoRez.pdf)), according to which the carbon debt from electricity production from wood sourced from Northeast US forests (not involving additional logging, which would lead to a higher carbon debt) will be more than 40 years compared to coal burning; a study by Joanneum Research, according to which the carbon debt from additional logging in managed European forests for biomass electricity is as high as 200-300 years, and a study by J McKechnie et al (<http://ec.europa.eu/environment/integration/research/newsalert/pdf/234na2.pdf>), according to which wood pellets derived from standing wood have a carbon debt of several decades, i.e. far longer than the projected lifetime of Forth Energy's power stations.
- ⤴ We note that one of the Swedish biomass power stations referred to as an 'example' in the report is the Oresundskraft Power Station in Helsingborg, with 44 MW electricity output much smaller than the proposed Grangemouth plant. According to information from Oresundskraft, high shipping costs have made imports of wood pellets from Canada uneconomic. The company have recently been obtaining wood pellets from Russia instead even though, according to one of their spokespeople, there have been problems with 'bad business ethic and bad quality' (uu.diva-portal.org/smash/get/diva2:383326/FULLTEXT02). This raises further questions over Forth Energy's sourcing claims.
- ⤴ The Addendum report states that supplies of UK wood as well as the removal of ash will require 58 truck movements a day in total. This would be a significant increase in local traffic.
- ⤴ Forth Energy claims that the plant will create 70 permanent jobs and bring £26 million a year to the local economy. Yet at the current rate of Renewable Obligation Certificates, this power station would attract around £54 million in subsidies every year – even more if some of the feedstock is classed as 'energy crops' and thus eligible for 2 rather than 1.5 ROCs per MWh. Furthermore, no evidence has been provided to back up the claims about jobs and benefits to the local economy.
- ⤴ The Addendum report contains even more optimistic claims about the potential for heat supply than the original planning documents, again, based on an unpublished report. We note that there is still no commitment to supply any heat, let alone help create a district heating network. Forth Energy state that a district heating network could be economically viable even without subsidies, but they do not indicate that they would financially contribute to one and no plans for such a heating network have been published by Falkirk Council either. The Forth Energy Addendum Report acknowledges that “the cost of implementing the district heating proposal is significant”.

Yours faithfully,

Almuth Ernsting
Co-Director
Biofuelwatch