



Department
of Energy &
Climate Change

The Rt Hon Amber Rudd MP
Secretary of State

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Biofuelwatch's critical comments on the Secretary of State's letter are appended as footnotes on p 2 - just 'page down' or click the footnote.

19th May 2016

Dear Biofuelwatch,

Thank you for your letter dated 20 April, enclosing a petition about the sustainability of biomass utilised by Drax.

Biomass conversions of coal power stations are just one part of the energy mix. They have played a transitional role in decarbonising the electricity grid in a cost effective manner and helping to ensure energy security.¹ I am clear that, under the right circumstances, biomass can have a valuable role to play in the secure, affordable, low carbon energy mix which this Government is determined to deliver.

This cannot be achieved without careful consideration of the effects which biomass can have on the wider environment. The fuels on which biomass is dependent need to be sourced responsibly and sustainably and in a manner which realises the carbon and greenhouse gas savings which biomass is capable of delivering.

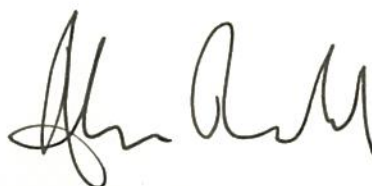
As you may know, the Government has introduced sustainability criteria for biomass generators.² These criteria take into account a range of social, economic and environmental issues including protecting biodiversity, land use rights, sustainable harvesting and regeneration rates.³ Generators over 1MW must also have their sustainability sourcing independently audited.⁴ Biomass power generators must achieve a minimum of 60% greenhouse gas lifecycle savings (against the average EU fossil electricity grid intensity) and these thresholds will be tightened to 75% by 2025.⁵

With our Climate Change Act, the UK has ambitious climate change goals to achieve into the 2030s. We need to look at our energy mix to ensure it delivers these ambitions.⁶ I am clear that unabated coal is not consistent with meeting our decarbonisation goals, and that is why last autumn I announced that my Department would consult on proposals to close unabated coal power stations by 2025 and we will proceed if we can be sure there will be no impact on the security of our electricity supply.

Government policy, as set out in paragraph 149 of the National Planning Policy Framework, states that planning permission by mineral planning authorities should not be given for the extraction of coal unless the proposal is environmentally acceptable, or can be made so by planning conditions or obligations; or if not, provides national, local or community benefits which clearly outweigh the likely impacts to justify the grant of permission. The Framework may be found at:
<http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf> .

Once again, may I thank you for your letter and petition.

Yours sincerely,



AMBER RUDD

Biofuelwatch comments on the Secretary of State's letter

1 decarbonising the energy grid, cost effective, ensure energy security

This is not true. Biomass is not low carbon and therefore not cost effective. In 2015 Drax received almost £470m in subsidy and stands to get £580.95 million – or £1.6 million a day once its 50% conversion to biomass is complete next year. DECC's own science shows that actual sourcing for Drax is up to 3 times worse than coal per unit of energy generated over at least 40 years. So this subsidy is contributing to carbon emissions and making climate change worse.

98% of Drax's feedstock is imported, the vast majority of it wood pellets sourced from the southern US, Canada and the Baltic States. Investing vast sums in a 'transitional' technology in fact maintains our dependence on old inefficient centralised combustion technology and is a false economy. Unlike investment in Wind and Solar there is an ongoing and probably increasing feedstock cost. Imports are intrinsically not energy secure.

2 sustainability criteria for biomass generators

which do not guarantee the above requirements at [1] are met.

3 protecting biodiversity, land use rights, sustainable harvesting and regeneration rates

The UK Biomass Sustainability and Greenhouse Gas Standards contain clauses that aim to do this. However observed practice of loggers on the ground, contravenes many of these standards. Clear-felling whole old trees from highly biodiverse hardwood wetland forest is routine.

4 sustainability sourcing (sic) independently audited.

by an auditor appointed and paid by the generator. Biomass electricity is dependent on government subsidies which are contingent on meeting the Standards creating a perverse incentive to prove sustainability at all costs.

5 generators must achieve... greenhouse gas savings.

However operators only have to account for the fossil fuel emissions from production and transport NOT the carbon emissions emitted from the smokestack from actually burning the wood. These emissions are routinely higher than coal per unit of energy delivered - yet are 'zero-counted' because it is assumed that the carbon is taken up by regrowth. For this to be justified as worthy of subsidy for contributing to climate change mitigation this growth must be additional to what would have happened anyway had that biomass not been harvested and burnt. This is not happening.

Other emissions from soil disturbed by felling and loss of sequestration are also not counted. When they are included the likelihood of there ever being a climate benefit in useful timescales is removed.

6 ambitious climate change goals to achieve.

The UK Bioenergy Strategy requires '*genuine* carbon reductions'. Presumably the Climate Change Act requires the same. Drax's claimed 20m tonnes of carbon savings from burning biomass instead of coal could in fact be an INCREASE in emissions. Much of their feedstock could be up to 3 times worse than coal over 40-100 years.