Biofuelwatch and Stop Burning Trees' Response to Drax's written evidence to the Environmental Audit Committee - https://committees.parliament.uk/writtenevidence/157374/pdf/ - March 2026

1) Drax claim: "*Drax owns and operates a portfolio of flexible, low carbon and renewable electricity generation assets. These assets include Drax Power Station in Selby and a growing portfolio of flexible generation including Cruachan Pumped Hydro Power Station, three new open cycle gas turbine (OCGT) projects, and three battery energy storage system (BESS) projects. Our assets will play a critical role in supporting the Government's 2030 clean power ambition and future carbon budgets.*"

- Drax is in fact the UK's single largest carbon emitter and emitted over 13 million tonnes of carbon dioxide in 2024.[1]
- The Climate Change Committee stated in its 2023 report 'Delivering a Reliable Decarbonised Power System', there should be no role for large-scale unabated biomass generation beyond the expiry of existing subsidy support in 2027 and that "sustained use of large-scale biomass generation is not compatible with the path to Net Zero."[2]
- The Climate Change Committee restated in its "Progress in reducing emissions - 2025 to Parliament" its priority recommendation for the UK Government to: "Ensure that large-scale biomass power plants are not given extended contracts to operate unabated at high load factors beyond 2027."[3]
- Burning wood for energy is not renewable, as hundreds of scientists have asserted: 'As numerous studies have shown, this burning of wood will increase warming for decades to centuries. That is true even when the wood replaces coal, oil or natural gas.'[4]
- Drax power station burns imported wood pellets and the feedstock for these pellets derives from trees on forest tracts. Much of the wood imported by Drax comes from the

[1] Ember, 2025, *Drax is UK's top carbon polluter yet again, widening lead with 16% increase in a year* https://ember-energy.org/latest-updates/drax-is-uks-top-carbon-polluter-yet-again-widening-lead-with-16-increase-in-a-year/

[2] Climate Change Committee, 2023, *Delivering a reliable decarbonised power system* https://www.theccc.org.uk/wp-content/uploads/2023/03/Delivering-a-reliable-decarbonised-power-system.pdf

[3] Climate Change Committee, 2025, *Progress in reducing emissions – 2025 report to Parliament* https://www.theccc.org.uk/publication/progress-in-reducing-emissions-2025-report-to-parliament/

[4] *Scientist Letter to Biden, Van der Leyden, Michel, Sugar & Moon Regarding Forest Bioenergy,* 2021, https://embed.documentcloud.org/documents/20482842-scientist-leter-to-biden-van-der-leyden-michel-suga-moon-february-11-2021

logging of biodiverse forests in the Southeastern USA, Canada, Estonia and Latvia, with devastating impacts on many rare and endangered species.[5]

- Within the time remaining before the global carbon budgets for "1.5°C" and, almost certainly, "well below 2°C", it will not be possible for those forest tracts to recoup the net loss of carbon and other ecosystem services which that exploitation causes – even without the increasing disruptions attributable to climate breakdown. Drax's letter ignores this reality – and the overarching context.

2) Drax claim*: Drax Power Station is the UK's largest biomass-powered electricity generator, with a capacity of 2.6GW and comprised of four biomass generating units. Sustainably sourced biomass enables Drax to support the UK's energy security and unlock the pathway to net zero with bioenergy with carbon capture and storage (BECCS).*

- Relying on imported energy is inherently more insecure than homegrown genuine renewables. UK energy security is at risk in that a single country - the US - supplies a very large share of the wood pellets Drax burns, and that share is likely to increase following Drax's recent announcement that it will stop sourcing from Canada.[6]

- BECCS will not contribute to us reaching net zero in any meaningful timeframe, as hundreds of scientists have asserted.[7]

3) *Drax claim: 'The biomass used at Drax Power Station must comply with the standards set out in UK law (including the requirements of the renewable support schemes under which Drax operates), the law of the country of source, as well as our own stringent sourcing policy. The UK has a world-leading framework to ensure the sustainability of biomass used for UK operations and is going further. '*

<u>Sourcing sustainable biomass</u>

- The Sustainable Biomass Program is a voluntary certification scheme set up by the biomass industry and it has not prevented the logging of primary forests in British Columbia in Canada.[8]

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[5]Dogwood Alliance, Natural Resources Defence Council and Southern Environmental Law Center, 2025, *Global Markets for Biomass Energy are Devastating North American Forests :* https://dogwoodalliance.org/wp-content/uploads/2025/10/Biomass-Investigation-Booklet-2025-for-web.pdf
[6]The Guardian, February 2026, *Drax Power Plant to Stop Burning Controversial Canadian Wood Within Next Year* https://www.theguardian.com/environment/2026/feb/26/drax-power-plant-to-stop-burning-controversial-canadian-wood-within-next-year
[7] Biofuelwatch website, February 2021, *A Statement by Scientists and Economists on BECCS from Forest Biomass* https://www.biofuelwatch.org.uk/docs/BECCS-letter-by-scientists-and-economists-1.pdf
[8] BBC News, 2024, *Drax: UK power station still burning rare forest wood: https://www.bbc.co.uk/news/science-environment-68381160*

- A July 2025 report by Solutions for our Climate, Biofuelwatch and other NGOs highlighted that SBP-certified Drax pellet mills in BC and Alberta, Canada source wood from primary forests, including old-growth forests.[9]

- Drax is currently being investigated by the Financial Conduct Authority over concerns about its sourcing of wood. (investigation launched August 2025).[10]

- In April 2025, the Public Accounts Committee warned that the biomass industry is effectively 'marking its own homework' when it comes to sustainability: 'The current assurance regime relies heavily on self–reporting and third–party certification schemes for ensuring these criteria are met, which runs the risk that biomass generators are marking their own homework. Ofgem's investigation into Drax has focused attention on these issues, but neither DESNZ nor Ofgem has a clear picture of how well generators are performing against these criteria.'[11]

- In most US states - the country which supplies the great majority of Drax's pellets - there are no regulations pertaining to the management of privately owned forest land. Most pellets from the USA derive from privately owned land.[12]

4) *Drax claim: 'Drax welcomes the enhancements to the sustainability requirements under the low carbon dispatchable CfD and the right for Low Carbon Contract Company (LCCC) to intervene where issues are identified:*

   Drax claim 3.1: Exclusion on the use of Primary and Old Growth Forest (PFOG) – Drax will not be able to source any forest residues (i.e. material that comes direct from the forest) from primary forest or old growth material.

- *Exclusion on the use of primary and old growth forests:* Stand.Earth's recent investigation showed that Drax was continuing to source trees from primary and old-growth forests in British Columbia in 2024 and 2025, including 250-year old trees.[13]

- Moreover, as there is no universally agreed definition of primary or old-growth forests they rely on source-country interpretation, national datasets, and classification systems that are frequently incomplete, inconsistent, or politically influenced. This creates substantial regulatory risk and undermines enforceability.

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[9] Solutions for Our Climate, Global Environmental Forum, Mighty Earth, Biofuelwatch, and Biomass Action Network of the Environmental Paper Network, 2025, *Sustainable Biomass Programme: Certifying the Unsustainable*':
https://www.biofuelwatch.org.uk/2025/sustainable-biomass-program-certifying-the-unsustainable
[10] Financial Conduct Authority, 2025, *Investigation into Drax Group*:
https://www.fca.org.uk/news/statements/investigation-drax-group
[11]Committee of Public Accounts, 2025, *Government's support for biomass:*
https://publications.parliament.uk/pa/cm5901/cmselect/cmpubacc/715/report.html
[12] Taylor and Francis, November 2021, *Forest biomass potential for wood pellets production in the United States of America for exportation: a review*
https://www.tandfonline.com/doi/full/10.1080/17597269.2022.2059951#d1e448
[13] Stand.Earth, 2005, '*Truckloads of Trees: Drax sourced wood pellets from old growth forests in B.C. in 2024, and likely 2025*': https://stand.earth/forest-eye/2025/11/09/forest-biomass-research-2025/

- Evidence from multiple jurisdictions demonstrates that official datasets cannot be assumed to provide an accurate or precautionary basis for classification.[14]

- In British Columbia, logging within designated old-growth deferral areas was reported in 2023 to be more than 50% higher than government figures suggested, indicating serious discrepancies in reporting and oversight.[15]

- Estonia has similarly acknowledged incomplete forest inventories, raising concerns about the integrity of forest categorisation.[16], [17]

- Investigative reporting, including by BBC Panorama, has further demonstrated how definitional ambiguities can be exploited, as seen by Drax's claim that a forest in British Columbia could not be classified as a primary forest as it was near a logging road.[18]

  Drax claim 3.2: '*Move to 100% sustainable biomass – a requirement to demonstrate that 100% of the woody biomass used is able to meet the Land Criteria for sustainability (currently at least 70% under existing RO/CfD agreements). This includes a requirement to adhere to the PFOG requirement. Drax has reported 100% compliance with the Sustainability Criteria for Drax Power Station for the last 5 years.'*

- 'Move to 100% sustainable biomass': it appears Drax's new subsidy contract, like the conditions for the current subsidies, continues the reliance on voluntary schemes such as the Sustainable Biomass Program, set up by the biomass industry.[19] Senior executives from biomass producers, including Drax and Enviva, have publicly served on the SBP board for years.[20]

- Drax is sourcing wood from the heart of a Global Biodiversity Hotspot in the Southeastern USA. These forests are home to many rare and endangered species and logging for the biomass industry is leading to the loss of irreplaceable ecosystems,

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[14] *Supra* note 12; Estonian Fund for Nature and Estwatch, 2021, *How Well Are Protected Forests of High Conservation Value Cared For?*, https://media.voog.com/0000/0037/1265/files/Natura-logging-Estonia-2021.pdf

[15] Stand.Earth, 2023, *Old growth logging in candidate deferral areas underestimated, more than 50 per cent higher than figures reported by B.C. government:* https://stand.earth/press-releases/old-growth-logging-in-candidate-deferral-areas-underestimated-more-than-50-per-cent-higher-than-figures-reported-by-b-c-government/

[16] Williams, M., Woodard, D., Brooks-Johnson, A., Cut Carbon Not Forests and NRDC, 2026, Biomass Mills in Estonia and Latvia Are Sourcing From Forests With Declining Carbon Stocks, https://cutcarbonnotforests.org/wp-content/uploads/2026/02/CCNF-Biomass-Estonia-and-Latvia-Factsheet.pdf

[17] Cut Carbon Not Forests, 2022, *Biomass sourcing in Estonia may violate UK sustainability standards for biomass*: https://www.cutcarbonnotforests.org/wp-content/uploads/2022/08/Biomass-Sourcing-in-Estonia.pdf

[18] Crowley, J. and Robinson, T., BBC Panorama, 2022, *Drax: UK power station owner cuts down primary forests in Canada*, https://www.bbc.co.uk/news/science-environment-63089348

[19] *Supra* note 9.

[20] Sustainable Biomass Program, 2026, SBP Board, https://sbp-cert.org/about-us/governance/people/sbp-board/#1545408939468-f37a4188-b679; SBP, 2023, SBP Directorate Change, https://sbp-cert.org/sbp-directorate-change/

particularly as the forests are not considered for protection under sustainability criteria or under the new subsidy arrangements.[21]

- Drax's claims of 100% compliance with the Sustainability Criteria is misleading: The Financial Conduct Authority is conducting an investigation into the company over concerns about Drax's sourcing of wood.[22]

- BBC Panorama investigations found that Drax misreported its sourcing of wood from primary forests in Canada for at least two years, a claim supported by Drax's own emails acknowledging the likelihood they burned wood from primary and old-growth Canadian forests.[23]

- 100% compliance with the Sustainability Criteria also allows for 30% of the biomass to come from 'unsustainable' sources - complying with this is hardly laudable.

Drax claim 3.3: '*Enhanced Monitoring, Reporting and Verification requirements – Drax will need to ensure that the supply chain is audited to a 'reasonable assurance' standard, up from 'limited assurance' today. Drax will also be required to increase the granularity of its reporting to the pellet mill level.'*

- BBC News investigations revealed in 2025 that Drax had misreported the sustainability data on its sourcing of wood on more than one occasion and the company had failed to disclose that it was using wood from primary and old-growth forests in British Columbia.[24]

- Drax agreed to pay £25 million to Ofgem in 2024 after the energy industry regulator found that the company had submitted inaccurate data on its sourcing of wood pellets.[25]

Drax claim 3.4: *Tightening of the GHG criteria (supply chain emissions) – The GHG threshold will be lowered to 36.6gCO2(eq)/MJ of electricity. The GHG ceiling will remain unchanged at 72.2gCO2(eq)/MJ of electricity.'*

- The new fossil-fuel related supply chain emission threshold is more than Drax's current supply chain emissions and overrides a 2019 decision for a much stricter limit on the supply chain greenhouse gas emissions (GHG) which wood-burning power stations can emit in order to receive new Contract for Difference subsidies.[26]

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[21] *Supra* note 5.
[22] Financial Conduct Authority, 2025, *Investigation into Drax Group:* https://www.fca.org.uk/news/statements/investigation-drax-group
[23] Millard, R. and Hodgson, C., Financial Times, 2024, *UK power stations burnt wood from old forests, Drax emails show*, https://www.ft.com/content/34550e7d-9d65-4756-8ffa-53f821dd14d0
[24] Crowley, J, *Key power station didn't properly disclose burning forest wood,* BBC News, 2025, https://www.bbc.co.uk/news/articles/cdxnpzzjed1o
[25] Ofgem, 2024, *Ofgem closes investigation into Drax Power Limited:* https://www.ofgem.gov.uk/news/ofgem-closes-investigation-drax-power-limited
[26]https://assets.publishing.service.gov.uk/media/5cc981abe5274a1ac83aff12/AR3-Standard-Terms-and-Conditions.pdf

- Drax would not have been able to meet the 2019 GHG limit and therefore this new limit, designed to support Drax, is largely meaningless.

International Carbon Accounting

5) Drax claim: *The carbon accounting for biomass is based on established global best practice and science, derived from principles set out by the world's leading authority on climate science – the UN IPCC. The science was agreed by the UN's IPCC in 2006[1] and reaffirmed in 2019[2].*

- The IPCC guidance is often used to justify counting biomass as carbon neutral. But even the IPCC says biomass should not be assumed to be carbon neutral when used for energy.[27] Instead, the IPCC states that when considering the true climate impact of wood used for energy, it is necessary to consider the emissions in the energy sector (i.e. those released at the power station) - not count them as zero. In other words, even if certain emissions were not added to the UK's formal accounts submitted to the United Nations Framework Convention on Climate change (UNFCCC), they represent bioenergy's true impact on forest carbon and the climate overall, and should be considered when determining whether bioenergy should be classified as a low-carbon technology deserving of low-carbon subsidies. The recent IPCC 6th assessment report states that 'life-cycle emissions impacts from bioenergy are subject to large uncertainties and could be incompatible with net zero emissions in some contexts." [28]

- The IPCC 6th assessment report was also unequivocal in showing that bioenergy and bioenergy with carbon capture and storage (BECCS) are costly and largely ineffective mitigation options compared to wind, solar, nature restoration and energy saving.[29]

- Hundreds of scientists have signed letters confirming that burning forest biomass in power stations is largely ineffective as a climate solution, and in fact makes climate change worse.[30]

- The European Academies Science Advisory Council (EASAC) and Chatham House, have both reached the same conclusion with EASAC stating that forest bioenergy is not carbon neutral until forests have regrown, which they say takes decades to centuries.[31]

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[27] Stashwick, S., NRDC, 2021, What the IPCC Really Says on Forest Biomass & Climate Change, https://www.nrdc.org/bio/sasha-stashwick/what-ipcc-really-says-forest-biomass-climate-change
[28] IPCC, 2022, *Climate Change 2022: Mitigation of Climate Change:* https://www.ipcc.ch/report/sixth-assessment-report-working-group-3/
[29] *Supra* note 26.
[30] *Supra* note 4.
[31] European Academies Scientific Advisory Council*, 2018, Commentary by the European Academies Scientific Advisory Council (EASAC) on Forest Bioenergy and Carbon Neutrality*, https://easac.eu/fileadmin/PDF_s/reports_statements/Carbon_Neutrality/EASAC_commentary_on_Carbon_Neutrality_15_June_2018.pdf
Chatham House, 2021, *Greenhouse gas emissions from burning US-sourced woody biomass in the EU and UK:* https://www.chathamhouse.org/2021/10/greenhouse-gas-emissions-burning-us-sourced-woody-biomass-eu-and-uk

6) Drax claim: '*Biomass is designated as renewable by the UNIPCC because of the closed carbon cycle created when trees grow and take CO2 from the atmosphere. Unlike the carbon dioxide released from the burning of fossil fuels, the CO2 released from biomass operates within a "biogenic carbon cycle", which is part of the continuous exchange of carbon between the biosphere (e.g. trees) and the atmosphere*.'

- Woody biomass creates a payback period of decades to hundreds of years i.e. carbon dioxide released into the atmosphere now when trees are burned at the power station takes a long time to be reabsorbed by trees through forest re-growth.

- Estimates are that the carbon payback period is anywhere between 44-104 years.[32] This is assuming forests cut down for biomass burning are able to grow back fully and is way beyond the much shorter timescales required for reducing CO2 levels in the atmosphere to mitigate against catastrophic climate change.

- Hundreds of scientists have warned that: 'regrowth takes time the world does not have to solve climate change. As numerous studies have shown, this burning of wood will increase warming for decades to centuries. That is true even when the wood replaces coal, oil or natural gas.'[33]

- Studies assessing the use of woody biomass for energy show that biomass burning in coal conversions such as Drax Power Station are in the worst categories from a climate perspective, yet accounting rules and public subsidies have led to an industry that is reducing even further our chances of meeting Paris Agreement targets.[34]

7) Drax claim: '*This guidance is adopted around the world and recognises the importance of the carbon cycle, the role that forests play in acting as carbon sinks and the evolving scientific evidence from the United Nations Framework Convention on Climate Change IPCC3. Under this approach, carbon emissions from biomass are counted in the Agriculture, Forestry and Other Land-Use (AFOLU) sector in the country of origin and are zero rated in the country of use. This prevents double counting of emissions, while still ensuring that the full life cycle emissions – production, cultivation, harvesting, collection, transportation, and processing of biomass – are accounted for*. Drax is not involved in the setting of this accounting practice, which has been reviewed and reaffirmed by the IPCC multiple times since its development in 1995, most recently in 2019'

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[32] Sterman, J,, Siegel, L., and Rooney-Varg, J., Environmental Research Letters, 2018 *Does replacing coal with wood lower CO2 emissions? Dynamic lifecycle analysis of wood bioenergy:* https://iopscience.iop.org/article/10.1088/1748-9326/aaa512

[33] *Supra* note 4.

[34] European Commission, 2020, *The use of woody biomass for energy production in the EU:* https://publications.jrc.ec.europa.eu/repository/handle/JRC122719;
European Academies Science Advisory Council, 2021, *Climate impact of woody biomass*: https://easac.eu/media-room/press-releases/details/easac-welcomes-that-the-jrc-report-strengthens-the-case-for-shorter-payback-periods-on-woody-biomass/

- So-called *sustainable forest management* is in fact eliminating global carbon sinks. Evidence from the EU shows that forest biomass harvesting is weakening the EU's forest carbon sink, with some Member States having lost their net forest sink completely, including heavily forested countries like Estonia, from which Drax sources wood.[35]

- In the US, research has shown that for Drax's own pellet mills, forest carbon stocks fluctuated over the 40 years analysed but showed a consistent reduction in both forest and wood products carbon stocks under a bioenergy (thinnings) scenario vs. the baseline (no thinnings) scenario.[36]

- Drax emitted over 13 million tonnes of carbon dioxide from its biomass burning in 2024 but did not officially have to count these emissions.[37]

- The USA, which supplies around 80% of Drax's wood pellets, has withdrawn from the UNFCCC Paris Agreement (2015) and can no longer be relied on to account for greenhouse gas emissions as required by the IPCC.[38] Drax cannot demonstrate whether or how the USA accounts for the net carbon flux of its supply chains.

8) Drax claim: '*Sustainable biomass helps to support healthy forest growth and the woody fibre in Drax's pellets comes from a range of sources including low-grade roundwood, forestry residues and secondary residues like sawdust 4 . The biomass industry acts as an off taker of this fibre and provides an additional revenue stream to the forestry and timber industries. The full make up of our biomass can be found in our Annual Report and Accounts.*'

- Evidence gathered from Dogwood Alliance, Natural Resources Defence Council (NRDC) and Southern Environmental Law Centre shows forests being clear cut and logging trucks driving whole logs directly to the pellet mills in the Southeastern USA.[39]

- Investigations by the BBC have found that Drax has more than once misreported the sustainability data about its sourcing of wood from primary and old-growth forests in British Columbia in Canada.[40]

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[35] Booth, M. & Giuntoli, J., 2025, *Burning Up the Carbon Sink: How the EU's Forest Biomass Policy Undermines Climate Mitigation*: https://onlinelibrary.wiley.com/doi/full/10.1111/gcbb.70035
[36] Buchholz, T., Gunn, j., Sharma, B., Frontiers in Forests and Global Change, Vol 4, May 2021, *When Biomass Electricity Demand Prompts Thinnings in Southern US Pine Plantations: A Forest Sector Greenhouse Gas Emissions Case Study:* https://www.frontiersin.org/journals/forests-and-global-change/articles/10.3389/ffgc.2021.642569/full
[37] Ember, 2025, *Drax is UK's top carbon polluter yet again, widening lead with 16% increase in a year* https://ember-energy.org/latest-updates/drax-is-uks-top-carbon-polluter-yet-again-widening-lead-with-16-increase-in-a-year/
[38]Carbon Direct, 2026, *The United States' Unconventional Withdrawal from the UNFCCC* https://www.carbon-direct.com/insights/the-united-states%E2%80%99-unconventional-withdrawal-from-the-unfccc
[39]'*Supra* note 5.
[40] Crowley, J., BBC News, 2025, *Key power station didn't properly disclose burning forest wood:* https://www.bbc.co.uk/news/articles/cdxnpzzjed1o

- A recent investigation by Stand.Earth revealed that the company is logging 250 year old trees in BC.[41]

9) Drax claim: '*Drax also produces Catchment Area Analyses to demonstrate that the carbon stock of the forests we source from remains stable or is increasing, and we have recently launched a new partnership with NGIS to map carbon stocks of Drax's North American biomass sourcing areas.*'

- Drax's wood pellets are certified under the Sustainable Biomass Programme (SBP). The SBP's approach to forest carbon stocks is highly problematic because it (1) allows forests outside the area managed for bioenergy to be considered;[42] and (2) considers biomass to be sustainable if carbon stocks are stable over the long term, which is defined as "several successive harvest cycles of anywhere from 20 to 100 years."[43]

- This means that meeting the Government's test of long term carbon stocks being maintained could take at least 40 to 200 years. Such an approach is fundamentally flawed and will allow for an increase in carbon dioxide emissions during a critical period for the climate, with scientists warning that the extreme heatwaves and flooding being experienced by countries around the world, including the UK, are the result of the worsening climate crisis.[44]

- A recent lifecycle analysis of BECCS at Drax (based on existing US supply chains), highlighted the flaws in reliance on stable forest carbon stocks. It found that the most important factor for the carbon analysis is "the impact of wood pellet sourcing on forest carbon stocks and flows" and concluded that "current biomass sustainability criteria focusing on stable or increasing forest productivity or carbon stocks do not capture the important time dependence of the system including forest carbon dynamics."[45]

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[41] *Supra* note 12.
[42] Sustainable Biomass Program, 2021, *SBP Standard 1: Feedstock Compliance. Principle 3 - Carbon in the landscape is maintained or increased*, https://sbp-cert.org/wp-content/uploads/2021/05/SBP-Standard-1-Revision-Draft-v1-Part-4-of-5-Principle-3.pdf
[43] Sustainable Biomass Program, 2023, *Glossary of Terms and Definitions*, https://sbp-cert.org/wp-content/uploads/2023/05/SBP_Standards_Glossary_v2.0_final.pdf
[44] The Guardian, March 2026, *Heatwave scorching US west 'virtually impossible' without climate crisis, say scientists* www.theguardian.com/us-news/2026/mar/20/heatwave-us-west-climate-crisis; The Guardian, March 2026, *Five disasters in a single wet season show the climate crisis is here and now in the Northern Territory,* www.theguardian.com/commentisfree/2026/mar/20/disasters-climate-crisis-northern-territory-australia; The Guardian, January 2026, *Homes may have to be abandoned': how climate crisis has reshaped Britain's flood risk* https://www.theguardian.com/news/ng-interactive/2026/jan/31/climate-crisis-flood-risk-britain
[45] Thomas Buchholz & Paul Pritchard, Climate Policy (submitted manuscript), 2026, *Bioenergy with Carbon Capture and Storage (BECCS): Consequential lifecycle assessment to inform UK net zero climate policy*, https://sig-gis.com/wp-content/uploads/2026/02/Manuscript-with-author-details-watermarked.pdf

- Estonia & Latvia - New analysis by NRDC (2026) looked at the carbon stocks of forests within 60km of 8 pellet mills in Estonia and Latvia.[46] All 8 pellet mills are closely linked to Drax and/or UK markets. This analysis found that forest carbon stocks within 60km of these pellet mills declined from 2015 (the first year Drax imported from either country) until 2022 (the last year data was available).

- Mississippi & Louisiana - A peer-reviewed study by Buchholz et al. (2021) assessed the lifecycle carbon impacts of wood pellets produced at 3 Drax-owned pellet mills in Mississippi and Louisiana that were burned for energy at Drax's UK power plant. The analysis looked at forests in an 80 km supply radius around the 3 pellet mills. A survey of forest experts in the supply radius determined that "pellet markets trigger[ed] harvesting activities that would not have occurred in the absence of pellet demand." Specifically, that "thinnings are largely foregone on NIPF pine plantations in the absence of the market for pellet feedstock ('baseline scenario'). The lifecycle analysis found a reduction in forest carbon stocks in the relevant forest area for at least 40 years.[47]

- Even when you expand to the wider landscape, there are many cases where the UK sources biomass from places where forests carbon stocks are declining. In several states in the US South (Alabama, Florida, Georgia, Mississippi, North Carolina, Virginia), the size of forest carbon sinks has progressively and consistently shrunk since 2015, coinciding with the growth of the wood pellet industry in the region.[48]

10) Drax claim: 'Delivering the BECCS potential': '*Drax previously outlined plans to invest billions in its BECCS proposals to transform Drax Power Station into the world's largest carbon removal facility, subject to the right support from the UK Government. This cutting-edge technology, if it is installed at two biomass generating units at Drax, has the potential to permanently remove 8 million tonnes of CO2 ($MtCO_2e$/year) from the atmosphere each year, which is approximately equivalent to taking 3 million internal combustion cars off the road.'*

- The recent IPCC 6th assessment report was unequivocal in showing that bioenergy and BECCS are costly and largely ineffective mitigation options compared to wind, solar, nature restoration and energy saving.[49]

- Recent analysis by the Spatial Informatics Group shows that the BECCS system would lead to higher atmospheric CO2 levels until beyond 2050. [50]

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[46] *Supra* note 15.
[47] *Supra* note 35.
[48] Forest Litigation Collaborative, 2024, *Response to the UK Government's Consultation on a transitional support mechanism for large-scale biomass generators*, https://forestlitigation.org/wp-content/uploads/2024/02/FLC-response-to-UK-consultation-on-bioenergy-transitional-support-Feb.-29-2024.pdf
[49] *Supra* note 26.
[50] Buchholz, T., Pritchard, P., Spatial Informatics Group, October 2024, *Implications for UK Net Zero of Bioenergy with Carbon Capture and Storage (BECCS) Utilising Southern US Sourced Biomass,* , https://sig-gis.com/uk-net-zero-bioenergy/

- The analysis assesses the whole system carbon impact if CCS technology were to become fully operational on all four units at Drax power station after 2030, with a 90% carbon capture rate. The analysis uses data from US forests and indicates that the proposed UK BECCS system would lead to more CO2e in the atmosphere than the counterfactual scenario without the BECCS system, until approximately 2053 and finds that the impact of the CCS technology, presumed to sequester CO2, is outweighed by the deleterious impact of wood pellet sourcing on forest carbon stocks and flows.

- Drax annual financial results announcement in February 2026 reported a £48 million impairment for its BECCS project and suggested that the company had abandoned plans for carbon capture for the near future, saying it would retain option for long-term development pending appropriate commercial and regulatory support for carbon removals in the UK' [51]

11) *Drax claim: 'Drax's ambition would contribute a considerable proportion of high quality GGRs towards the UK's carbon budgets and 2050 net zero target. If there was sufficient demand in the market, or if required to meet UK carbon budgets, and with the right support mechanisms in place, Drax does have the potential to scale BECCS on a unit-by-unit basis up to four biomass generating units.'*

- There is no evidence that Drax has the technical expertise to operate BECCS at scale, nor are there any examples of large-scale woody biomass BECCS around the world.[52]

- Even if BECCS were to work at scale, research demonstrates that it would not contribute to the UK reaching the 2050 net zero target.[53]

- The methodology for accounting negative emissions has not yet been put forward. The IPCC aims to finalise methodologies for national greenhouse gas accounting which cover carbon dioxide removal technologies, including BECCS, in 2027.

- Until such a methodology has been finalised, no country can account for 'negative emissions' from BECCS. It is far from clear which country 'negative emissions' will be attributed to, if CO2 is captured from the burning of imported biomass.

- Currently, UNFCCC accounting rules say that carbon emissions from logging forests for biomass energy are accounted for in the land use and forestry (LULUCF) sector of the country where the wood comes from. It was decided decades ago that CO2 emissions from burning wood would not be accounted for in the energy sector in order to avoid counting them twice.

- There is therefore a strong argument that the 'negative emissions' should also be attributed to the country where the wood comes from. Consequently, in the unlikely event

[51] Drax, February 2026, *Full year results for the twelve months ended 31 December 2025,* https://www.drax.com/financial-news/full-year-results-for-the-twelve-months-ended-31-december-2025/
[52] Biofuelwatch, November 2022, *Carbon Capture from biomass and waste incineration: Hype versus reality,* https://www.biofuelwatch.org.uk/wp-content/uploads/BECCS-report-2022-final.pdf
[53] *Supra* note 46.

that Drax is able to produce 'negative emissions', these may not even contribute to balancing the UK's carbon budgets.[54]

12) Drax claim: '*Conversion of Drax Power Station to BECCS is a very low regret option for Government to secure a large proportion of the carbon removals it will need to meet its net zero target. The power station is already operational, with an existing workforce and logistical capability, strong links through the supply chain, and expertise in securing biomass supplies. All the technology is proven, including through pilot projects to extract CO2 from biomass flue gas at the station and the project is at a high level of readiness, having completed FEED. It is therefore a very deliverable project*.'

- Far from a 'low regret' option, the CCS industry has a long and expensive history of failure, according to the International Energy Agency's (IEA) World Energy Outlook 2025, CCUS is projected to contribute less than 5% to offsetting emissions by 2050 and is not essential to achieving decarbonisation.[55]

- Drax's 2026 financial report revealed that the company has paused BECCS investment indefinitely in the short to medium term.[56]

- Specifically in relation to its BECCS workforce capacity, Drax made mass redundancies at C-Capture - the carbon capture company it backed - early last year[57] and has since made more redundancies, the majority from Elimini, its carbon capture business where it has cut the number of workers on its flagship project by half.[58]

- GMB has announced Drax is cutting up to 150 jobs at their site in Selby, about 10% of the current workforce.[59] Will Gardiner has confirmed that Drax is cutting at least 350 jobs across their operations.[60]

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[54]IPCC, November 2025, *IPCC calls for nominations of authors for 2027 Methodology Report on Carbon Dioxide Removal Technologies, Carbon Capture, Utilization and Storage https://www.ipcc.ch/2025/11/19/calltficdrccus/*

[55]Institute for Energy Economics and Financial Analysis, January 2026, *Minimal role for carbon capture, utilization, and storage (CCUS) in IEA's World Energy Outlook 2025* https://ieefa.org/resources/minimal-role-carbon-capture-utilization-and-storage-ccus-ieas-world-energy-outlook-2025

[56] *Supra* note 47.

[57]Yorkshire Post, March 2025, *C-Capture: Mass redundancies at Yorkshire carbon capture firm backed by Government, Drax and BP,* https://www.yorkshirepost.co.uk/business/c-capture-mass-redundancies-at-yorkshire-carbon-capture-firm-backed-by-government-drax-and-bp-5012716

[58] Business Green, December 2025, *Reports: Drax to axe more than half its CCS workforce* https://www.businessgreen.com/news/4523230/reports-drax-axe-half-ccs-workforce

[59] GMB Union, February 2026*, Drax cuts: Up to 150 jobs to go next year* https://www.gmb.org.uk/news/drax-cuts-up-to-150-jobs-to-go-next-year

[60]Yorkshire Post, February 2026, *Drax boss responds to Yorkshire job cuts and questions over own future as Government deal hailed* https://www.yorkshirepost.co.uk/business/drax-boss-responds-to-yorkshire-job-cuts-and-questions-over-own-future-as-government-deal-hailed-5612815

- Drax has previously admitted in written correspondence with Biofuelwatch that its assumptions about BECCS performance are not based on real-world trials. This suggests that the technology is far from ready for implementation.[61]

13) *Drax claim: Analysis conducted by Baringa for Drax shows that converting Drax Power Station to BECCS would save the UK £15bn in terms of the overall cost of achieving net zero – it is considerably more cost effective and deliverable than other solutions the Government would otherwise have to deploy*

- Ember estimates that BECCS at Drax would cost the public £31.7 billion in subsidies, despite the major risk that the plant will not deliver the negative emissions promised.[62]

- Carbon Capture Use and Storage (CCUS), which includes BECCS, faces high investment and operating costs, bespoke project designs, and inflation-sensitive components and materials, which make it economically uncompetitive compared to renewable energy and storage technologies. CCUS projects have been delayed, cancelled, or failed to materialize, often due to unfavorable economics, despite claims of the technology's "vital" role in decarbonization.[63]

- The International Energy Agency (IEA) has downgraded the technology, with renewables, electrification, fuel switching, and energy efficiency projected to contribute over 82% of the emissions reductions needed to achieve net zero.[64]

- Drax's BECCS plan is the first of its kind in the world, and the company claims it will capture 95% of CO_2 emitted. The world's only operating commercial carbon capture facility at a coal-fired power plant (coal being another solid fuel thus giving the best available comparison), is Boundary Dam, in Canada. The carbon capture rate there in 2023 was 57%, 63% of the official target of 90%. The plant's performance is so far short of its original target the company has now revised its carbon capture target downward to just 65%. SaskPower's own CO2 capture data shows that Boundary Dam's overall capture rate during its nine years in service has been closer to 50% than 90%. The poor performance at Boundary Dam is a strong indication that Drax's expected carbon capture rate from BECCS is highly implausible.[65]

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[61] Biofuelwatch, June 2021, *Drax Plc's carbon capture claims not based on any real-world evidence, company reveals to campaigners,* https://www.biofuelwatch.org.uk/2021/drax-plcs-carbon-capture-claims-not-based-on-any-real-world-evidence-company-reveals-to-campaigners/

[62] Ember, May 2021, *The cost of the Drax BECCS plant to UK consumers,* https://ember-energy.org/latest-insights/cost-drax-beccs-plant/

[63] *Supra* note 52.

[64] *Supra* note 52

[65] Institute for Energy Economics and Financial Analysis, April 2024, *Carbon Capture Boundary Dam 3 still an underperforming failure,* https://ieefa.org/resources/carbon-capture-boundary-dam-3-still-underperforming-failure

14) *Drax claim: Drax continues to evaluate the option for BECCS at Drax Power Station, and, consistent with the position set out by Drax in 2023, has paused its investment programme in respect of its development of BECCS pending clear Government policy support and milestones, including details of the subsequent allocation rounds for CCS projects and transportation and storage processes.*

- Any polluting industry can argue that it is environmentally friendly on the basis that if the government pays it to clean up its act it will do so. Drax made a lot of noise about its commitment to BECCS following the advice from the Climate Change Committee that there should be no more subsidies for unabated BECCS. That it has paused development of BECCS and made redundant many of its staff working in this area shows that the company's commitment to BECCS is hollow and entirely financially motivated. Meanwhile the company is aiming to continue burning woody biomass at current levels, at odds with the government's announcement that it would be supporting Drax to operate at reduced load factors, by powering new data centres. Drax is determined to pursue other options for burning trees for electricity despite the harm caused to the world's forests, along with wildlife, communities and the climate, in order to maximise profits.