

Dear Sir/Madam,

Re: Blue NG planning application for power plant in Ealing, Ref. P/2009/0780

I write on behalf of Biofuelwatch to object to the vegetable oil power plant which Blue NG propose to build in Southall. We would also ask you to take the information in our report about Blue NG into account as part of this objection http://www.biofuelwatch.org.uk/files/blue_ng_factsheet130409.pdf. References for statements in this objection letter can be found in the report.

Our concerns relate to the following areas:

Biofuel sourcing:

Blue NG states that they intend to use local or domestic rapeseed oil, but that they may also use imports, provided that they are accredited through ‘internationally recognised certification’. This is a very general and vague statement. It allows, for example, palm oil to be used at any time. In Germany, nearly all power plants that use vegetable oil are run on palm oil and a study commissioned by the German government has shown that this is due to financial reasons, since palm oil is always considerably cheaper than rapeseed oil or indeed any vegetable oil produced in Europe. Palm oil production is directly linked to deforestation and peatland destruction and thus to significantly accelerated global warming. It is also linked to the displacement of rural communities, including indigenous peoples, in many cases through violent evictions. In this context, it is important to note that under the ‘sustainability standards’ agreed by the European Union even biofuels directly linked to evictions and human rights abuses, including even murder, are classed as ‘sustainable’.

The UK is currently a net importer of rapeseed oil. Imports are likely to rise this year, since the current area of land under oilseed rape is 12% smaller than last year. Most formerly set-aside land has been converted to intensive agriculture and Defra are concerned about the impact of recent and future conversion of former set-aside land on biodiversity and water quality. A study by nobel laureate Paul Crutzen suggests that rapeseed biofuels are linked to up to 70% more greenhouse gas emissions than equivalent amounts of mineral oil, solely due to nitrous oxide emissions linked to fertiliser use. Moreover, Europe’s use of rapeseed oil for biofuels has been identified as a key reason for growing palm oil imports. The European Environment Agency recently warned: *“In Europe we could produce biodiesel from rapeseed oil in a sustainable manner, but less rapeseed oil would be available for food production inside and outside Europe. The gap is likely to be filled in part by palm oil. However, this would result in the loss of rainforest, as trees in countries such as Indonesia are felled to facilitate the extra palm crops.”* A report published this month by Friends of the Earth found that biodiesel produced from UK-grown oilseed rape causes 59% greater greenhouse gas emissions than mineral diesel when land-use changes and the climate impacts of intensive agriculture are taken into account. This all clearly shows that the overall impact of biofuel sourcing for the proposed power plant will be seriously negative for the climate, for biodiversity, and for communities in the global South.

Finally, increased use of food crops and of land has been shown to have been a major factor behind food price rises in recent years – according to a report by the World Bank, biofuels may have been responsible for as much as 75% of the price rises by last year. The United Nations Food and Agriculture Organisation has shown that biofuels now drive vegetable oil prices in the EU.

On the basis of this evidence, the fuel which Blue NG intends to use cannot be considered to be sustainable, and it can be expected to have a significant negative overall impact on greenhouse gas emissions.

Air pollution and public health:

London Borough of Ealing has only just released the Air Quality Assessment for the proposed Southall plant for public consultation, and we have not been able to review it in depth. However we have serious concerns about the inevitable increase in concentrations of NO_x, PM₁₀ and PM 2.5 as a result of vegetable oil burning. Ealing was designated an Air Quality Management Area in 2000 and its latest progress report (April 2008) estimated that it is highly probable that more than 55 sites will exceed the NO_x annual mean objective in 2010. We understand these projections were made without taking account of the additional emissions from the Blue NG plant. Blair Peach Primary School and Hambrough Primary School are both within one kilometre of the site. Measurements given in the April 2008 progress report showed that NO_x levels were already 46% above legal limits in 2007 and that PM₁₀ levels at Blair Peach Primary School were above the daily limit more often in 2007 than in 2006. Those levels would rise even further.

A recent report by the Campaign for Clean Air in London suggests that 2,900 people a year are dying prematurely as a result of PM₁₀ pollution, nearly three times more than previously estimated (<http://www.cleanairinlondon.org/>). NO_x and the ground level ozone have been linked to an increase in lung disease, including asthma. PM 2.5 is associated with cardiac and respiratory diseases and premature deaths, and there is evidence between high PM 2.5 levels and an increased incidence in Sudden Infant Death Syndrome.

We would point out that air quality impacts should be assessed based on all potential biofuel feedstock, not just based on rapeseed oil since Blue NG is keeping open the option of using imports such as palm oil or jatropha oil.

The recent decisions to cancel plans for a western extension of congestion charge and to suspend the third phase of the low emission zone will lessen the chances of London meeting its air quality objectives. If the Blue NG power station at Southall goes ahead it will make these objectives even more difficult to meet. The already approved Blue NG plant at Beckton will be burning similar quantities of vegetable oil (just under 20,000 tonnes per year), adding to London's air quality problems in an area close to the 2012 Olympics site.

We would also like to point out that smell and noise nuisance have been serious concerns around vegetable oil power plants in Germany. In April 2008, a court revoked a planning permission for a palm oil CHP plant on those grounds.

Can you please confirm receipt of our objection. Many thanks.

Regards,

Deepak Rughani
Biofuelwatch