

**Application Number 34C40Z/EIA/ECON
Peboc, Llangefni
Biomass Energy Development (consisting of a wood pelleting plant, a biomass combined heat and power plant, a wood storage yard and a debarking and chipping plant.**

From:
Biofuelwatch
biofuelwatch@ymail.com

Dear Mr Wynne Williams,

Re: New documents and consultation in relation to EcoPellet's application for the Peboc Biomass Energy Development, Ref 34C40Z/EIA/ECON

We have looked carefully through the new documents and wish to confirm that the concerns expressed on our previous planning objection, dated 22nd August 2011, are still valid. We would like to add additional comments relating to

- 1) EcoPellets' claims about sourcing and climate impacts;
- 2) Air Quality Impacts
- 3) Health and Safety

We also comment on

- 4) Job claims.

1) Claims about sourcing and climate impacts

Most of the changes made to the planning documents by EcoPellets relate to biomass sourcing.

We continue to have serious concerns about the credibility of the sourcing claims.

Tallow availability:

With regards to the proposed bioliquids CHP plant, EcoPellet now claim that they only intend to burn tallow, whereas the previous Planning Statement said: "*The liquid biomass CHP plant will burn fuels such as tallow, recovered vegetable oil (RVO) and vegetable oils in a large diesel engine*", and referred to rapeseed oil as one available potential feedstock.

EcoPellets claim that they can source 22,500 tonnes of tallow a year and achieve substantial greenhouse gas savings. We cannot comment on their claims that two companies intend to enter into long-term supply contracts of tallow and can meet the total bioliquids requirement, since information about EcoPellets' discussions with suppliers is not publicly available. However, we wish to point out that they cite very selectively from data about the UK tallow market and that their claims about 'greenhouse gas savings', including from allegedly preventing tallow being disposed of in landfill or through incineration, are misleading.

EcoPellets state that "*Almost 50% of all industrial tallow or 165,000 tonnes, is currently used for heating fuel in the UK. Estimates of the amount of tallow currently used in the UK range from 290,000 tonnes /year to 337,000 tonnes/year, with a conservative estimate of 240,000 tonnes / year available for industrial use. There is approximately 30,000 tonnes / year imported from Continental Europe and Ireland.*"

The 165,000 tonnes and the 337,000 t figures are taken from a report jointly commissioned by DECC and the Renewable Fuels Agency¹. According to that report, 150,000 tonnes a year of

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<http://webarchive.nationalarchives.gov.uk/20110407094507/http://renewablefuelsagency.gov.uk/sites/renew>

tallow are produced in the UK which, for health and safety reasons, can only be used for fuel, whereas the rest is in demand for oleochemicals, soap, animal feed and the food industry. In 2008, 165,000 tonnes were used for heating fuel and 39,000 tonnes for biodiesel. **Any additional tallow use for biofuels will result in indirect greenhouse gas emissions which can cause tallow to result in greater greenhouse gas emissions overall than those from burning equivalent amounts of fossil fuels.** If tallow is diverted from heating oil to other biofuel use (such as in the proposed bioliquid CHP plants), it is most likely to be replaced with mineral oil for heating. If it is diverted from the food, oleochemical or soap sector, larger palm oil imports are most likely to result. If it is diverted from the biodiesel sector, more palm or soya imports for biodiesel are likely. Contrary to what EcoPellets claim, an Environment Agency report which have cited from, too², actually states: "All tallow is used for an economic purpose; none is disposed of via landfill or incineration."

Could EcoPellets burn other types of bioliquids if their application was approved?

EcoPellets now claim that the PeboC Power Purchase Agreement allows them to only burn tallow, not vegetable oils including Used Cooking Oil and that the Environment Agency also does not permit them to burn used cooking oil. According to advice we got on the phone from Lara Cubley at the Environment Agency in Wales, this is not the case – the EA does not disallow burning used cooking oil for heat and power. Furthermore, Mrs Cubley stated that EcoPellets' permitting application to the EA is for burning vegetable oil as well as tallow. **This suggests serious inconsistencies about the company's sourcing claims.**

We have never come across the National Grid or any other electricity purchaser imposing conditions on fuel sourcing that are not part of planning conditions. Since the PPA is not public information, we cannot verify what it states, however we presume that any statements about fuel sourcing would have been added by EcoPellets and could be changed at any time.

As we said in our previous objection to this application, developers' stated sourcing intentions are not legally binding and they can and have in some cases been changed subsequent to planning permission being granted. One very relevant example is that of a CHP bioliquids plant at Trostrey which, according to Ofgem data, was run on a type of palm oil (palm fatty acid distillates)³. The planning application, approved by Monmouthshire Council, had stated that the fuel would be local rapeseed oil⁴. The Trostrey development was small-scale and was made by a local farmer, hence it seems highly unlikely that the intention would have been to mislead planners and to burn palm oil. **What this case illustrates accords with the experience of many bioliquid CHP plant developers in Germany, i.e. that they find that, contrary to their original intentions, feedstock other than palm oil is very difficult to source at economically viable prices.**

Wood supply:

Our comments about written sourcing intentions not being binding relate to biomass as well as bioliquids and, as we commented on in our previous planning objection, we are aware that the developer had been looking at sourcing wood from further afield, including Nova Scotia. Here we would like to solely comment on their new claims regarding wood sourcing and availability.

EcoPellets state that the pellet plant will use 100,000 oven dried tonnes (odt), or 200,000 green tonnes a year. Of this, 85,000 green tonnes a year will be woodchips and sawdust derived from forest wood and 85,000 tonnes will be 'composted wood' and that "*this material will be sourced predominantly from within an approximate 100 mile radius of the PeboC site*". 'Composted wood' is not a term we have been able to find anywhere else (except to describe wood, especially woodchips, which has literally been composted), so we assume that they mean recovered/recycled wood. Elsewhere in the Planning Statement, they say that 180,000 tonnes

ablefuelsagency.gov.uk/files/documents/RFA-DECC_Indirect_Effects_of_Wastes_Report.pdf and http://webarchive.nationalarchives.gov.uk/20110407094507/http://www.renewablefuelsagency.gov.uk/sites/rfa/files/documents/Appendix_7_-_Tallow_Case_Study_200912231729.pdf

2 www.environment-agency.gov.uk/static/documents/Business/Financial_impact_assessment_for_biodiesel_.pdf

3 http://webcache.googleusercontent.com/search?q=cache:LupJzIq7LRUJ:www.ofgem.gov.uk/Sustainability/Environment/RenewablObl/FuelledStations/Documents1/SR%2520Master%2520report_publish.xls+trostrey+palm+oil&cd=4&hl=en&ct=clnk&gl=uk

4 Monmouthshire Planning Committee minutes 14th July 2009

of 'forest wood' will be required.

According to EcoPellets an additional 150,000 – 175,000 tonnes of wood will be required for the biomass CHP plant (presumably dry tonnes, although the application does not make this clear) and all of that will be bark and recycled/recovered wood.

According to the Planning Statement, all of the forest wood resources for the pellet plant are 'currently not used' and available from two forest districts in Wales. They state: "*In terms of forest wood resources that can be utilized by the plant, the following forest districts have 217,606 available dry tonnes Coed y Mynydd Forest District and Coed y Gororau Forest District.*" For those claims, they cite the Forestry Commissions' Woodfuel Resource website⁵. According to that website, total wood 'available' from those two forest districts will in fact be 403,897 odt/year for 2012-2017 (excluding poor quality brash deemed unsuitable for anything other than firewood) – the figure for the period 2017-2021 will be lower. Those figures however, are not for 'currently not used' wood but include all wood from both forest districts already harvested and used. They also include all stemwood, yet according to the Forestry Commission's Woodfuel Resource website, stemwood of more than 14cm diameter and of good form is unlikely to be diverted from existing sawn timber markets to energy markets, for economic reasons. If stemwood of more than 14cm diameter is excluded, then annual wood availability from the two forest districts for 2012-2017 will be just under 100,000 odt, i.e. less than half of what is claimed by EcoPellets. That figure includes wood currently used for example by the wood panel industry.

Sourcing claims for the proposed biomass CHP plant are even more questionable. According to the Woodfuel Resource website, the total volume of bark available as a 'primary processing product' in Wales is just over 20,000 odt a year. This means that as much as 155,000 tonnes a year would have to come from recovered wood. Yet according to the most recent Market Report by WRAP⁶, total 'wood waste arisings' in Wales are currently around 180,000 tonnes a year and those are not dry tonnes but have a moisture content of 18-25% , hence total recovered wood will be between 135,000 and 147,600 odt a year in Wales – less than the demand from the proposed biomass CHP plant wood be, let alone the additional demand from the proposed pellet plant. The great majority of 'waste wood arisings' in Wales and across the UK are already in use by the wood panel industry, for animal bedding, mulches, soil conditioners and composting, pathways and coverings and bioenergy. Across the UK, the amount of wood waste disposed of in landfill or burnt on site has been falling consistently and a report commissioned by the Confederation of Forest Industries, the UK Forest Products Association and the Wood Panel Industries Federation⁷, waste wood demand from bioenergy is expected to exceed total waste wood arisings in the UK before 2015. **This means that EcoPellets will have to procure wood from sources other than those which they list.**

Competing bioenergy demands for wood:

While EcoPellets are right to say that there are no existing large wood pellet plants in North Wales, they omit to mention Vogen's planned 300,000 tonne pellet plant in Newport, South Wales, which has planning consent. Furthermore, EcoPellets claim that their proposed pellet plant would be the closest larger one to markets in the North of England, yet a 500,000 tonne/year pellet plant is already under development in Castleford, Yorkshire⁸

Their claim that no biomass CHP plant exists in North Wales omits the UPM Shotton biomass CHP plant with a capacity of 19.7 MWe which, at full capacity, will require just under 200,000 odt of biomass a year.

Furthermore, they make no mention of the proposed biomass CHP plant competing with smaller-scale wood bioenergy use, including for wood boilers and small-sale CHP, for example

5 www.eforestry.gov.uk/woodfuel/, linked from www.eforestry.gov.uk/woodfuel/

6 Realising the value of recovered wood, Market Situation Report 2011, WRAP, www.wrap.org.uk/downloads/Wood_MSR_Final_Aug_2011.9353e38f.11101.pdf

7 Wood fibre availability and demand in Britain 2007-2025, John Clegg Consulting Ltd, www.confor.org.uk/Upload/Documents/37_WoodFibreAvailabilityDemandReportfinal.pdf

8 www.aeternumcapital.com/biofuels-renewable-energy/biomass-aeternum's-business-model/learn-more/castleford-pellet-plant/ and www.azocleantech.com/news.aspx?newsID=16013

in schools, hospitals and government buildings. Woodchip and pellet use for heat, already incentivised through the Wood Energy Business Scheme and through Feed-in Tariffs, are to increase significantly as a result of the Renewable Heat Incentive. Elsewhere in Wales, the Western Wood Bioenergy Plant requires up to 150,000 tonnes of biomass at full capacity, a planned 47 MW biomass power station in Newport (for which planning consent has been granted and investment appears to have been secured) will need some 470,000 tonnes a year, part of which is to be imported and part sourced domestically. While the planned biomass power stations at Port Talbot and Holyhead will be heavily import-reliant, the developers have nonetheless stated that they plan to source some of the biomass domestically, too. Furthermore, DECC have proposed to double the amount of Renewable Obligation Certificates for co-firing if companies co-fire at least 15% of biomass with coal ('enhanced co-firing')⁹. To benefit from those higher subsidies, RWE Npower would need to generate 225 MW of electricity from biomass at Aberthaw and SSE would need to generate 59 MW from biomass at Uskmouth B. The additional biomass demand from 'enhanced co-firing' in Wales would be around 2.8 million tonnes or more if the 15% figure was exceeded. Competing bioenergy Those competing demands for limited domestic wood resources make it even more unlikely that EcoPellets can guarantee to source most of the wood from within a 100 mile radius and all of it from the UK. With regards to the claimed 'carbon savings' we have previously pointed out that they have not shown how their figures have been calculated (and they still do not show this) and that they appear to ignore the carbon debt associated with (directly or indirectly) increased logging for bioenergy.

2. Air quality impacts:

No substantial changes have been made to the Air Quality Assessment except that references to residents living at Llwyn Ednyfed, 250 metres east of the site, have been added. However, we have now been able to look more closely at the claims made in both Air Quality Assessments and would like to submit the following additional comments:

1) The Air Quality Assessment is based on the assumption that legal limits under the Waste Incineration Directive (WID) can and will be observed, i.e. those limits are used as the basis for modelling, without any consideration whether it will be technically feasible to stay within them with the proposed technology and at the proposed capacity. The WID limit for NO_x stack emissions is 200 mg/Nm³. For NO_x mitigation, EcoPellets do not propose to install Selective Catalytic Reduction or Selective Non-Catalytic Reduction (i.e. de-NO_x devices) but merely to use flue-gas recirculation (FGR). According to the IPPC Reference Document on the Best Available Technique for Waste Incineration 2006: "Even with FGR, a de-NO_x device is required for reaching, under any operational condition, a level of 200 mg/Nm³"¹⁰. Similarly, the IPPC reference document for the Large Combustion Plant Directive¹¹ shows that with biomass grate-firing and without SCR or SNCR that level can be expected to be regularly exceeded. Although the figures in that document (as opposed to the BREF for Waste Incineration) relate to plants 50 MW and larger, there is no reason to expect a smaller plant size to improve those figures. The same document shows that for burning liquid fuels in power plants of less than 100MW, NO_x emission rates of 150-300 mg/m³ will be reached only if primary mitigation is combined with a deNO_x device. The document does not distinguish between biofuels and liquid fossil fuels, however industry figures by Waertsila (one of the main suppliers of bioliquid power stations using diesel engines) suggest that burning unrefined biofuels tends to result in significantly higher NO_x emissions than burning light fuel oil and commonly in higher ones than burning heavy fuel oil¹². For liquid-fuel-fired diesel engines, flue-gas recirculation is not listed as Best Available Technique, or indeed as a NO_x mitigation strategy at all.

Our concerns that the assumed 200 mg/NM³ limit is unlikely to be observed with the technology proposed by EcoPellets are born out by a copy of the Environment Agency annual monitoring report for the Western Bioenergy Plant at Margam, Port Talbot (see attached).

9 www.decc.gov.uk/assets/decc/11/consultation/ro-banding/3235-consultation-ro-banding.pdf

10 http://eippcb.jrc.es/reference/BREF/wi_bref_0806.pdf, p.255

11 http://eippcb.jrc.es/reference/BREF/lcp_bref_0706.pdf, Table 5.34

12 www.cibse.org/pdfs/Niklas%20Haga.pdf

There, the annual emission rate of NO_x for 2010 was between 200 and 230 mg/m³ - mostly above 200 mg/m³. Like the proposed EcoPellets plant in Llangefni, the plant in Margam uses neither SCR nor SNCR. The report further shows that NO_x emissions are increased if a greater proportion of waste wood rather than virgin wood is burnt.

No evidence has been provided as to how EcoPellets believe that they can meet the limit value for NO_x emissions. They have not cited any other plants, burning similar feedstock with similar technology that have succeeded in doing so. Furthermore, uncertainties over feedstock, including about the amount and type of waste wood to be used make predictions for NO_x and other emissions even less reliable.

2) If the NO_x stack emissions rate was higher than predicted then none the NO_x related figures contained in the Air Quality Statement will be correct/reliable and both the Process Contributions and the Predicted Environmental Concentrations at different sites will be higher than predicted.

3) **Ecosystem impacts of air pollution:**

According to EcoPellet's air quality assessment, the lower level of the Critical Load for **nitrogen deposition** is currently exceeded at the Corsydd Mon/Anglesey Fens SAC, the Glantraeth SAC and the Y Twyni o Abermenai I Aberffraw SAC and the Cors Ddygga/Maltraeth Marshes SSSI. At the Corsydd Mon/Anglesey Fens SAC, the process contribution is predicted to be as much as 1.7% of the annual permitted level although as we have shown above, the may well be greater. Species diversity in alkaline and calcareous fens is highly sensitive to nitrogen and depends on maintaining low nitrogen levels¹³.

At the Nant y Pandy/Dingle Local Nature Reserve, the critical nitrogen load is already heavily exceeded and according to EcoPellets' Air Quality statement, the process contribution would be as high as 3.1% of the legal limit although as discussed above it may well be higher.

For **acid deposition**, the lower rates of the critical load are currently exceeded at the Corsydd Mon/Anglesey Fens SAC, Cors Ddygga/Maltraeth Marshes SSSI and at the Nant y Pandy/Dingle Local Nature Reserve. At each of those sites, EcoPellets predict that the process contribution is likely to be more than 1% of the Critical Load. Given that acid deposition is linked to nitrogen deposition, the actual process contribution may well be higher. Furthermore, if EcoPellets were required to use a de-NO_x device (which they are not proposing to use) then acid deposition rates could be even higher.

3) Health and Safety:

No new information has been submitted by EcoPellets, however we would like to submit further information regarding our concerns. Certainly, Volume 4 Chapter 14 Health Impact Assessment of the application, does not consider the issue of explosion and fire risk that the plant would constitute if constructed:

The risk of spontaneous combustion and dust explosion in wood pellet and wood combustion plants is widely recognised but has not been acknowledged by EcoPellets in their application. According to the US Government's Occupational Safety & Health Administration: "*Combustible dusts, including wood dust, are fine particles that present a potentially catastrophic explosion hazard when suspended in the air in certain conditions. Since 1980, more than 130 workers have been killed and 780 injured in combustible dust explosions in a variety of industries across the nation*"¹⁴. Biomass explosions and fires have been reported from different countries with biomass power stations, some of them causing injuries and deaths. For example, a recent dust explosion at RWE's 750,000 tpa wood pellet factory in Georgia, US was reportedly felt by residents 5 miles away¹⁵. In the UK, a recent fire in a 200 tonne wood pellet pile at the

13 See for example <http://www.mendeley.com/research/nutrient-enrichment-in-calcareous-fens-effects-on-plant-species-and-community-structure/>, <http://www.mendeley.com/research/vegetation-soils-land-calcareous-fens-eastern-new-york-adjacent-connecticut/> ,

14 www.reliableplant.com/Read/23313/OSHA-cites-Maine-pellet-mill

15 www.renewablesinternational.net/following-explosion-worlds-largest-pellet-plant-resumes-operation/150/515/31440/

Port of Tyneside, believed to have been caused by spontaneous combustion, took the fire brigade over 12 hours to extinguish, even though the amount of wood stored at the site was far smaller than what would be stored at the Peboc site¹⁶. (tinyurl.com/c8zmv5x).

Explosion risks appear of particular concern because the site is only 250 metres from residential properties as well as being adjacent to other industrial sites, yet we can see nothing in EcoPellets' application to suggest that they have any plans for mitigating/addressing them. They do propose dust containment, yet without any mention of dust monitoring or effective dust suppression inside the plants. According to the UK's Solids Handling and Processing Association, SHAPA: "*Many biomass dusts are more sensitive to ignition than coal dust, and with their greater tendency to travel and deposit through the workplace this leads to an increased risk. Additionally, the need to use much more effective enclosure gives rise to new explosion risks, not just because the enclosures themselves have the potential to bust under explosion pressure but also because they can add to the danger of explosions being conducted from one part of the plant to another*"¹⁷.

4) Claims about jobs

EcoPellets claim that 150 permanent jobs will be 'sustained' by the development, but they do not say how many jobs will be directly created in Llangefni. Instead, their Planning Statement (5.22) makes it clear that their jobs figure includes direct as well as indirect job creation and 'induced economic multiplier effects'. Indirect impacts would include technology supply and presumably wood supply, yet any jobs created that way, as well as an unknown proportion of any 'economic multiplier effect' would be outside Anglesey.

The number of jobs claimed seems to vary somewhat throughout the various documents submitted within the developers application:

In the document:

Proposed Biomass Energy Development, Bryn Cefni, Llangefni, Anglesey

'It is anticipated that the Biomass Energy Development will directly result in the creation of about 200 jobs for the local community, requiring a range of skills including managerial, engineering, process operation, maintenance, secretarial, etc.'

Biomass Green Energy Development. Frequently Asked Questions & Answers

'Q. How many jobs will the Biomass Energy Plant create?

A. It is anticipated that the plant will generate about 100 new permanent jobs for the local economy. This will include a wide range of skills and expertise including senior management, electrical and mechanical engineering, process operation, maintenance engineers, clerical staff, etc, with salaries commensurate with what would be expected for such a high prestige environmental development.

There will also be benefits for nearby rural communities associated with the need to promote sustainable woodland and forestry management practices, which will help preserve jobs in the countryside. There will be over 200 jobs for two years during construction'.

It is interesting that in this second document, the number of local jobs is halved for an almost identical list of job titles. The 'Answer' then refers to preserving jobs in local forestry. There must be doubt that this is of any significance if wood is coming from Scotland or Nova Scotia for example. Furthermore it is not job creation and therefore should not be attributed as such. Finally, as stated in our conclusion to this section, this development could actually lead to nett job losses elsewhere and in other industries, if it went ahead.

Volume 4 Chapter 2 Project Description

'Operational Workforce

4.2.121 The plant will be in operation on a 24/7 basis and directly employ a full time staff of some 60 people, mainly skilled local staff.'

¹⁶ www.journallive.co.uk/north-east-news/todays-news/2011/10/31/firefighters-battle-huge-biomass-fire-at-port-of-tyne-61634-29689277/

¹⁷ www.shapa.co.uk/pdf/biomass.pdf

The organisational chart for 4.2.121 clarifies that the 60 will be 62 and that 36 of these staff will be shift workers. The figure of 60 or 62 is certainly less than 200 or indeed 100.

'4.2.122 Approximately 100 people will be employed in the logistics chain related to the supply of wood, biomass and liquid biomass fuels to the plant as well as the supply of the wood pellet product to the local coal power stations, industrial/commercial boilers and to the domestic retail market'.

Chapter 9 on transportation makes it clear that most deliveries to the plant will be utilizing Ecopellets existing vehicle fleet. Are these not existing jobs? In, *'Biomass Green Energy Development. Frequently Asked Questions & Answers'*, employment related to the supply chain were discussed in terms of preserving local jobs. In 4.2.122, there is no mention of employment being local, (which tallies with Nova Scotia etc) and the inference here is that supply chain will be created as opposed to being preserved by this plant.

'Volume 4 Chapter 9 Transportation

4.9.50 When the Biomass Energy Development becomes operational it is anticipated that there will be a requirement for 25 to 30 operational staff to man and run the two biomass CHP units, the pelleting operation and the timber pretreatment unit. Administration and management staff will be housed in the main plant building. It is anticipated that there could be a maximum of 15 staff employed to support the operation of the Biomass Energy Development however trips generated by these staff will already have been accounted for when the Eastman Peboc offices were developed.

4.9.51 The Biomass Energy Development will operate 24 hours per day and to achieve this the operatives will work three shifts currently envisaged as 06.00 – 14.00, 14.00 – 22.00 and 22.00 – 06.00. By operating these times no staff trips will occur during the traditional peak hours.'

25-30 staff is once again less than 200, 100, 62 or 60. There is no mention of additional staff in 4.9.51 and it would be reasonable to assume that shift workers would be considered 'operational staff'. If shift workers have not in fact been included as operational staff, then in 4.2.121, it was shown that shift staff total 36 and all other jobs on the plant totalled 26, which is somewhat more precise than 25-30. Such inconsistencies must be of concern for local residents.

'Volume 4 Chapter 13, Socio-Economic

'4.13.7 Strategic Policy 3: To facilitate and promote employment opportunities at a suitable scale and at suitable locations throughout the County'.

Anglesey is an island with very little forestry. Feedstock and waste will have to be conveyed many miles by lorries. Feedstock may be imported across the Atlantic or from SE Asia if palm oil were used. The plant location is not next to a port. The plant location is not accessible by rail due to risks associated with flooding. All of these factors illustrate that Peboc, Llangefni is not a suitable location for this plant.

'4.13.8 Policy B1: Employment generating developments which increase employment opportunities, which do not create unacceptable changes to the environment, and are acceptable to the local planning authority in terms of location, siting, scale, design, access and landscaping will be permitted'.

The supply of biomass and biofuels and their combustion, will 'create an unacceptable change to the environment'.

'4.13.13 One of the objectives of the UDP is to encourage economic opportunities which will help provide satisfying, secure and remunerative jobs, and therefore reduce the number of people leaving the island in search of work'

It is not clear from comments made within this application how confident the developer remains that jobs will be suitable for local residents.

'4.13.16 The Green Jobs Strategy 'Capturing the Potential' provides an important delivery for the Sustainable Development Scheme, One Wales: One Planet, and describes how Wales can achieve its vision of A resilient and sustainable economy for Wales that is able to develop

whilst stabilizing, then reducing, use of natural resources and reducing its contribution to climate change'

This plant will increase the use of natural resources, rather than stabilizing, then reducing their use. The plant will actually increase Wales's contribution to climate change.

'4.13.30 Once operational it is expected that the Biomass Energy Development will employ 60 full-time operational staff directly and 100 full-time staff in logistics and support services indirectly. The operational staff will include a wide range of skills and expertise including senior management, electrical and mechanical engineering, process operation, maintenance engineers, clerical staff, etc.'

The 60 figure is repeated but not 62, 100 or 200. This time, the 100 indirect jobs are not attributed as an approximation.

4.13.33 It is expected that there could be at least 50 additional permanent jobs created or safeguarded locally, in connection with the infrastructure that will be required to support the operation of the Biomass Energy Development. This would include the transportation of raw materials into, and finished wood pellets, out of the site, as well as the maintenance of the fleet vehicles involved. The process equipment associated with the wood pellet manufacturing process and the biomass CHP plants will require frequent preventative maintenance if the plant is to operate reliably and efficiently, and there will be opportunities for local engineering companies to provide this service.

'Additional' has a great deal of difference to 'safeguarded' in a region where jobs are at a premium. The 50 figure might appear additional to the previously quoted 100 indirect jobs, but this would not appear to be entirely the case, since the 100 figure already includes transportation and these jobs appear to be existing Ecoplellets positions.

Direct and indirect employment Impact

4.13.36 Direct employment will be available in the companies that supply direct products and services to the proposal during each phase. Other companies further up the supply chain used by these companies will also win additional work.

Induced Employment Impact

4.13.37 Household expenditure by those whose jobs are supported by the project will further support additional jobs by the demand they create as consumers. The direct and indirect employment will support additional jobs in the wider economy, an effect called induced employment.

If such indirect impacts on employment are relevant and material to a planning decision then the indirect impacts of biomass and biofuels should also be considered and taken into account within the application and by the local planning authority. These include biodiversity loss, adverse affect on soil, water, climate change, human rights, the right to food and the importation of virtual water.

Direct Employment

4.13.38 The plant will be in operation on a 24/7 basis and employ a full time staff of some 60 people, mainly skilled local staff. The plant has a design life of over 30 years and can be repowered after this time for further indefinite periods.

Once again we see a figure of 60, rather than 62, 100 or 200. This time the skilled jobs will be 'mainly' local. The notion that there is an indefinite supply of forests or land on our planet is false and mis-leading.

4.13.42 Approximately 100 people will be employed in the logistics chain related to the supply of wood, biomass and liquid biomass fuels to the plant as well as the supply of the 100,000 tonnes of wood pellet product ..'

Again the 100 is an approximation and there is no mention of the 50 jobs associated with the infrastructure of the plant.

4.13.53 *The proposed new Renewable Energy Plant is expected to have a significant positive impact on the economy and employment structure at a local and regional level through the creation of over 250 temporary and 150 permanent jobs during its construction and operation.* Here we are presented with yet another figure of 150 for the plant operation that is neither 26, 25-30, 60, 62 100 or 200? At least the figure for construction has remained relatively consistent throughout the application, although this has been nearer to 200 elsewhere in the application. There is no guarantee that specialist construction work could be satisfied by local workers as we suggest that such a large-scale project would go out to national contract and contractors may well be chosen on a price competitive basis or previous track-record in this field. Why would a developer limit his choice to the residents of Llangefni if this were the basis for selection?

4.13.55 *It is proposed that workers will be employed from the locality where practicable.* We contend that this statement is a rather vague assurance. What does, 'where practicable' actually mean or amount to?

Claims about indirect job creation through bioenergy are highly questionable. As the report by John Clegg Consulting Ltd cited above states: "If new large users of British grown wood and other wood fibre enter the marketplace, supported by subsidy, then it can only be at the expense of existing users, impacting negatively and disproportionately on sustainability, employment, carbon sequestration, and mitigation of climate change"¹⁸. According to figures published by the Wood Panel Industries Federation, "the spiralling development of large- scale wood fired energy plants in the UK threatens 8,700 UK jobs"¹⁹. As we shown above, EcoPellets can be expected to compete for biomass with existing industries which depend on wood and which sustain much higher levels of employment for the same quantity of wood²⁰. The indirect job impacts could thus be very much negative, while figures for direct jobs being created at Llangefni have not even been proposed by the company.

Yours sincerely,

Almuth Ernsting & Ian Lander, 9th January 2012
Biofuelwatch

18 www.confor.org.uk/Upload/Documents/37_WoodFibreAvailabilityDemandReportfinal.pdf

19 www.makewoodwork.co.uk/GalleryEntries/Latest_News/Documents/Make_Wood_Work_Press_Release_June_28.pdf

20 The Confederation of Paper Industries, for example, have published figures to show that paper production creates 13 times as many jobs for the same amount of wood as bioenergy, see www.icfpa.org/keymessages0510.pdf