

**From:** [REDACTED]  
**To:** [tom.mcgarra@edf-energy.com](mailto:tom.mcgarra@edf-energy.com); [info@sizewellc.co.uk](mailto:info@sizewellc.co.uk)  
**Cc:** ["Sizewell C NNB"](#); [SizewellC](#); [sizewell@suffolk.gov.uk](mailto:sizewell@suffolk.gov.uk); [sizewellc@eastsuffolk.gov.uk](mailto:sizewellc@eastsuffolk.gov.uk); [therese.coffey.mp@parliament.uk](mailto:therese.coffey.mp@parliament.uk)  
**Subject:** EdF's zero carbon claim  
**Date:** 02 December 2020 14:46:53  
**Attachments:** [BEIS and carbon Press Release.doc](#)  
[edf letter seeking compliance on "zero" carbon.doc](#)

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Please refer to the attached letter and press release. We would welcome a response to our request contained in the letter at your earliest convenience.

Sincerely,

Pete Wilkinson

Chairman, <<...>> <<...>> Together Against Sizewell C



# Together Against Sizewell C

To: [info@sizewellc.co.uk](mailto:info@sizewellc.co.uk)

2 December 2020

## **EDF's false claims regarding Sizewell C's climate change benefits**

Please see the attached email correspondence between TASC Chairman, Pete Wilkinson, and Stephen Speed, Director of Nuclear at BEIS.

You will see that Mr Speed has agreed with TASC that the table found on its website <http://www.edfenergy.com/zero-carbon> to which EdF refers when attempting to justify its claim that the company is the largest producer of 'zero carbon electricity', is in error and will be changed. The table claims, without conditionally referencing reactor (generator) emissions, that nuclear power is a source which produces zero emissions, a statement which BEIS acknowledge is incorrect and which it has agreed to amend. This table appears to have been used to justify the EdF claim which can no longer be justified in the light of BEIS's agreement to amend its 'zero' carbon score to nuclear power.

We therefore respectfully ask you to refrain from referring to nuclear power as a zero carbon source of electricity in your advertisements or public statements unless you qualify the claim by making it explicit that 'zero' refers only to reactor emissions and that it excludes operational carbon generation (transport, refuelling, outages and general plant maintenance) and the uranium fuel cycle from mining, plant construction through to spent fuel and other radioactive waste management and disposal.

You will be interested to know that the Advertising Standards Authority is still considering the TASC/Stop Sizewell C complaint regarding EdF's claim that Sizewell C will 'save' 9 million tonnes of carbon for every year of operation compared to a gas fired plant, a claim which has been roundly discredited. There will only be a comparatively short, notional operational window for the plant to off-set carbon (circa 2035 – 2050) before the energy sector is, by law, completely decarbonised, thereby denying Sizewell C the opportunity to demonstrate such so-called benefits for the majority of its projected 60 year-long operational life.

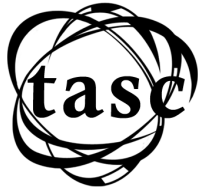
TASC would appreciate a response to this email with confirmation that EdF will henceforth stop referring to Sizewell C as producing zero carbon electricity unless qualified as above.

Sincerely,

Pete Wilkinson

Cc Suffolk County Council, East Suffolk Council, Rt Hon Therese Coffey MP, PINS

TASC website [tasizewellc.org.uk](http://tasizewellc.org.uk)



# Together Against Sizewell C

PRESS RELEASE

NO EMBARGO

30 NOVEMBER 2020

## **Business, Environment and Industrial Strategy (BEIS) Department accept that nuclear is not a 'zero carbon' source of electricity– implications for EdF's advertisement claims**

On the 15<sup>th</sup> October, Together Against Sizewell C (TASC) wrote to BEIS pointing out that the nuclear power developer behind Hinkley Point C and the notional Sizewell C plants was justifying its TV ad claim that it is the 'biggest producer of carbon free electricity' by referencing a BEIS website in which the claim of 'zero carbon' was made for renewables and nuclear.

In a response to TASC received on the 25<sup>th</sup> November, Director of Nuclear at BEIS, Stephen Speed who also co-chairs the BEIS/NGO nuclear forum acknowledged the error, stated, '....we agree with your argument that the environmental impact table of the Fuel Mix Disclosure report could cause confusion. I have asked for the report to be amended with a line that explains that the table relates only to generator emissions in the operational phase and does not include emissions related to the fuel supply chain or maintenance activities.'

Despite the fact that TASC would still contest the assumption that even generator carbon emissions are zero, the concession from BEIS is a good interim result.

Commenting on the agreement to alter the information on the website, Pete Wilkinson, Chairman of TASC, said today, 'This acknowledgement from BEIS is welcome and important. At a time when the future of nuclear power in the UK is in the balance, removing official support for the zero carbon claim changes the game, and fundamentally exposes nuclear power's climate change credentials as insignificant. The word 'zero' can no longer be used when referencing nuclear power and carbon.

'Moreover, it forces EdF to desist in making the assertion which they had hitherto justified by pointing to a BEIS website which upheld their misplaced claim.

'It may also, finally, force our local MP, Dr Therese Coffey, to drop the phrase as well. Incredibly for a Secretary of State, she has used the zero carbon claim in her response to the EdF planning application which the inspectorate will be examining next year and has refused to meet members of TASC on the grounds that our anti-nuclear views are 'well known'. Such an attitude is rude, facile and possibly in breach of the Parliamentary Code.'

For further information

Pete Wilkinson [REDACTED]

Chris Wilson [REDACTED]

Encls: BEIS correspondence

Dear Pete,

I am really sorry about the unacceptably slow response to your original email.

You raise some legitimate issues and I note that you have directed your concerns about the accuracy of advertising to the Advertising Standards Authority for investigation.

Separately, I asked the BEIS analysts to look into the specific issue you raised about BEIS published data being used to support the EDF claims. Having assessed this, we agree with your argument that the environmental impact table of the Fuel Mix Disclosure report could cause confusion. I have asked for the report to be amended with a line that explains that the table relates only to generator emissions in the operational phase and does not include emissions related to the fuel supply chain or maintenance activities. In our statistics, such as [Energy Trends table 5.1](#), nuclear and renewable generation is reported as 'low carbon' not zero carbon.

Once again I am sorry for the delay and I hope this reply is helpful, in spite of that.

Yours sincerely

Stephen



Department for  
Business, Energy  
& Industrial Strategy

Stephen Speed

Director, Nuclear

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**From:** Pete Wilkinson [REDACTED]

**Sent:** 17 November 2020 09:57

**To:** Speed, Stephen (Civil Nuclear & Resilience) <[stephen.speed@beis.gov.uk](mailto:stephen.speed@beis.gov.uk)>

**Cc:** Andrew.Blowers <[REDACTED]>

**Subject:** FW: zero carbon claim for nuclear

Dear Stephen,

Another two weeks pass without so much as an acknowledgement from you or your department for the issue I raised over a month ago. Meanwhile, EdF continues to tell millions of people through their advertisements that nuclear is 'zero carbon', a manifest bit of misinformation which they justify by steering people towards a BEIS website. Even Therese Coffey MP - a Secretary of State no less - has used the 'zero carbon' mantra in her relevant representation on Sizewell C. Pedalling such false propaganda with apparent government backing really can't continue.

I hope to hear from you.

Best wishes,



TASC website [tasizewellc.org.uk](http://tasizewellc.org.uk)

Pete Wilkinson

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**From:** Pete Wilkinson [REDACTED]  
**Sent:** Wednesday, November 4, 2020 11:13 AM  
**To:** Speed Stephen (Civil Nuclear and Resilience) <[stephen.speed@beis.gov.uk](mailto:stephen.speed@beis.gov.uk)>  
**Cc:** Andrew.Blowers <[REDACTED]>  
**Subject:** RE: zero carbon claim for nuclear

Dear Stephen,

I would be grateful if you would reply to my email below sent on the 15<sup>th</sup> October. I'm sure you can appreciate that as a community faced with a decade of disruption should Sizewell C be approved, to allow EdF to continue to falsely claim that nuclear power creates zero carbon electricity based on BEIS information is an added insult we could do without. We would be very grateful for your response to this issue forthwith.

Best wishes,

Pete Wilkinson

Chairman TASC

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**From:** Pete Wilkinson [REDACTED]  
**Sent:** Thursday, October 15, 2020 3:04 PM  
**To:** Speed Stephen (Civil Nuclear and Resilience) <[stephen.speed@beis.gov.uk](mailto:stephen.speed@beis.gov.uk)>  
**Cc:** Andrew.Blowers <[REDACTED]>  
**Subject:** zero carbon claim for nuclear

Dear Stephen,

Together Against Sizewell C has jointly complained to the Advertising Standards Authority (ASA) about EdF's claims that SZC will 'save' 9m tonnes of carbon for every year of operation', which it can't possibly do as by 2050, after only ten operational years, if SZC is ever built, there will be no carbon in the energy sector to off-set, by law.

The ASA has referred our complaint to its investigations team and we await the outcome. In the meantime, EdF TV ads claim in the accompanying commentary that EdF is the 'largest generator of **zero carbon** electricity in Britain (emphasis added).' You can see the ad here: <https://www.campaignlive.co.uk/article/edf-busy-doing-nothing-havas-london/1695080>.

The small print, written in a disclaimer box at the foot of the TV advertisement, says: 'Fuel mix disclosure information, published by the government (BEIS) recognises electricity from wind, solar and nuclear fuel produces zero carbon dioxide emissions **at the point of generation**. For verification visit: <http://www.edfenergy.com/zero-carbon> (emphasis added).'

If you follow that website, you are then directed to a BEIS site at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/906175/fuel-mix-disclosure-data-2019-2020.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906175/fuel-mix-disclosure-data-2019-2020.pdf)

This contains the following chart:



TASC website [tasizewellc.org.uk](http://tasizewellc.org.uk)

### 3. Environmental impact (relevant to Paragraph 11 of the Regulations)

#### Carbon Dioxide Emissions Energy Source g/kWh

Coal	985	
Natural Gas	371	
Nuclear	0	
Renewables	0	
Other	920	
Overall average	198	

I can find no clarification of these figures in the Electricity (Fuel Mix Disclosure) Regulations 2005 nor discern the accuracy with which they were arrived at but even at the point of generation, a claim of 'zero carbon' for nuclear and renewables is questionable insofar as routine maintenance will involve some carbon generation during operation, be they nuclear or renewable, while keeping in mind that nuclear reactors require routine refuelling which increases its carbon footprint even under operational conditions. Across the nuclear fuel cycle, of course, the carbon debt is significant. The problem with the BEIS chart is that it makes no reference to the zero carbon claim being 'at the point of generation' and therefore gives licence to the EdF spoken claim in the TV advertisement that nuclear is a 'zero carbon' source of electricity because the BEIS chart indicates so. It requires the viewer to take the unlikely step of checking the claim on the BEIS website, leaving the clarification of the EdF claim to the inconspicuous small print attached to the advertisement.

I would be grateful if you could either let me know where I am wrong in my conclusions above or let me know if BEIS accepts the case for altering the chart to be found on its 'fuel mix disclosure' website to make it clear that its 'zero carbon' scores for renewables and nuclear are in respect of the operational phase only, that they are generalisations due to the uncertainty of carbon generation from maintenance activities, and that across fuel cycles, the carbon debts of nuclear power and renewables is not zero. I refer you to the attached report for a more accurate calculation of the actual carbon debt which can be legitimately ascribed to nuclear power.

<< File: sovacool\_nuclear\_ghg.pdf >>

With best wishes,

Pete Wilkinson