

## **Initial Assessment of Principal Issues**

I submit the following for consideration under the Initial Assessment of Principal Issues. The text might be applicable under more than one heading or solely under a different heading.

### **1. Air quality and emissions**

The applicant has suggested a particular carbon capture technology but does not know what cocktail of solvents it will ultimately deploy (or what their impact on air quality and receptors might be). That which it mentions in its application might not achieve the promised 95% capture rate – even in the unlikely event that the carbon capture facility is working at full capacity throughout the year. Other technologies might prove more cost effective (including in relation to energy penalty) but require reconstruction and perhaps a new planning application.

The applicant has made substantial payments to remedy air pollution at three of its pellet mills in environmental justice areas of USA.

### **2. Biodiversity and Ecology**

Drax power station would close in 2027 when the ROC subsidies (which exceed the Drax group's net profit) expire. Continuing to operate the power station implies continuing to import woody biomass as now. The impact of that fuel's supply chains should therefore be wholly attributed to the proposal. As such, it should be taken into account by the Examining Authority (for example against *Clause 4.1.3 of NPS EN-1*) – even if the immediate, cumulative and long-term harm occurs outside the UK. The proposal centres on the global environment and relies on countries other than the UK to sequester the CO<sub>2</sub> emissions which are not captured along the supply chain, from woodland to supposedly permanent store (and make up for the foregone sequestration in that woodland).

The applicant does not currently compensate for any such harm. The application does not propose such compensation.

The applicant's imports of woody biomass promote logging including by adding value to sawdust and offcuts, thereby increasing the commercial viability of sawmills. Other than from long-established monoculture wood farms (/ plantations), landowners may opt to cash in while they can, while pellet mills offer the best or only price for their trees. As such, a pellet mill's wood raw material might derive from clear cutting, which is inherently unsustainable (especially given the need for resilience in face of the collapsing climate), including regionally due to forest fragmentation.

*Such supplies conflict with the requirements of the first bullet point of Clause 2.5.5. of NPS EN-3.* Parliament is increasingly questioning the applicant's supply chains and CO<sub>2</sub> emissions. A recent Secretary of State for BEIS has voiced such concerns.

Concerning Clause 2.5.7 of NPS EN-3, it would be reasonable to assess the applicant's influence over the shaping of sustainability criteria. The majority of the woody biomass which the applicant burns derive from USA, specifically private land (including dozens or hundreds of plots per pellet mill). This might in part reflect that such land is lightly regulated. Given the importance of forest land to the climate and biodiversity crises, it may be inappropriate for auditors to be paid by the applicant (or pellet mills which supply the applicant) to adopt certification systems which assess a small percentage of those plots.

Contrary to industry rhetoric, the *true* value of forest land and trees is very much greater than zero if their *commercial* value when the only market is sawmills (especially those which require sustained quantities of similar quality).

### **3. Climate Change**

This application is being considered before the applications of other components of the Zero Carbon Humber scheme have been adjudicated. This is remarkable. It is remarkable not least because Drax' application is wholly predicated on the approval of those applications: primarily the leak-and-rupture-free pipeline and supposedly-but-unprovably permanent storage.

For the reasons set out under the heading Biodiversity and Ecology above, it would be remiss under the Climate Change heading to not take into account the impact of the proposal on CO2 emissions - and sequestration - outside the UK.

Concerning clauses 2.5.26 and 2.5.27 of NPS EN-3, the applicant has not detailed what if any heat it currently supplies or proposes to supply customers in the vicinity of the power station. The efficiency of deriving energy from wood at the power station is already very low and would be lower still if the carbon capture and compression facilities enter service.

Forest land is increasingly becoming a carbon source (not a sink) – partly due to its management and the collapsing climate. If wood is to be used as a fuel, this should be for heat locally to its source of supply, not hundreds or thousands of miles away for electricity (especially for industries which have no place in a net zero world).

### **12. Scope of development**

Concerning clause 2.5.8 of NPS EN-3, the applicant has not demonstrated Carbon Capture Readiness. The applicant cannot do so until it has demonstrated (to an independent assessor) that at least 95% of the CO2 emissions burned in the first generating unit are being captured during foreseeable operating conditions, which might be intermittent or being at the ready (attracting subsidies for what it burns not the electricity despatched).

Crucially, given the risks to the downstream pipeline, the carbon capture facility should not be considered ready until the captured emissions are consistently proven to exclude moisture and corrosive matter before they enter the downstream pipeline.

The applicant should state how it proposes to ensure that the aging Drax power station will fully sustain the operation of the carbon capture facility for the duration of the latter's intended life. This may depend on how the downstream pipeline is operated – and the price which the applicant would have to pay to the pipeline operator.

If having a carbon capture capable facility (regardless of whether it is in service) is an aim of the application, the applicant should not benefit from the facility being deemed carbon capture ready or capable until (if ever) the downstream components are in service. Reliance on hope or necessity should be inadmissible.